



World Tax Advisor
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Australia: Pillar Two: ATO releases guidance on transitional CbC reporting safe harbor

The Australian Taxation Office has released new guidance on the application of the transitional country-by-country reporting safe harbor provisions under Australia's Pillar Two rules. The guidance aligns with the OECD model rules and relevant consolidated commentary regarding the application of the transitional safe harbor.

URL: <https://www.taxathand.com/article/40504/Australia/2025/Pillar-Two-ATO-releases-guidance-on-transitional-CbC-reporting-safe-harbor>

Colombia: DIAN updates rules for digital platform reporting

The National Tax Authority has issued a resolution introducing new reporting obligations for certain nonresident digital platforms operating in the Colombian market. The resolution amends and clarifies regulations that apply to digital platform operators in Colombia required to submit information under the OECD Multilateral Competent Authority Agreement on Automatic Exchange of Information on Income Derived through Digital Platforms (DPI MCAA).

URL: <https://www.taxathand.com/article/40495/Colombia/2025/DIAN-updates-rules-for-digital-platform-reporting>

European Union: European Commission announces 2026 work program

The European Commission has presented the 2026 Commission Work Programme, which outlines an ambitious roadmap to strengthen Europe's competitiveness, security, and social resilience, keeping in mind strategic autonomy. This article discusses anticipated tax directives for 2026, as well as tax proposals that are pending or intended to be withdrawn.

URL: <https://www.taxathand.com/article/40493/European-Union/2025/European-Commission-announces-2026-work-program>

France: Tax authorities publish first set of guidelines regarding Pillar Two rules

The tax authorities have published the first set of guidelines regarding the French Pillar Two rules, which clarify the definitions of various concepts, as well as the rules relating to the scope of Pillar Two and its territoriality. The tax authorities have also indicated that further administrative guidance will address other related topics, with the next guidelines expected to address the safe harbor rules.

URL: <https://www.taxathand.com/article/40499/France/2025/FTA-publishes-first-set-of-guidelines-regarding-Pillar-Two-rules>

Malaysia: Tax highlights of Budget 2026 include measures intended to attract investment

Budget 2026 has been unveiled and places strong emphasis on digitalization, the “green” transition, and the wellbeing of the population, and includes measures intended to attract investment and increase tax collection. Significant tax proposals include an extension and expansion of the scope of the corporate income tax exemption for certain foreign-source dividends and capital gains.

URL: <https://www.taxathand.com/article/40494/Malaysia/2025/Tax-highlights-of-Budget-2026-include-measures-intended-to-attract-investment>

Norway: Highlights of 2026 state budget

The Ministry of Finance has presented the state budget for 2026, which includes proposed changes to the taxation of mutual funds and adjustments to Norway’s Pillar Two legislation. The ministry has also issued a consultation paper proposing changes as from 2027 to the rules governing the repayment of paid-in capital; the consultation is open until 15 January 2026.

URL: <https://www.taxathand.com/article/40511/Norway/2025/Highlights-of-2026-state-budget>

OECD: New batch of transfer pricing country profiles released

The OECD has released a new batch of transfer pricing country profiles for 30 jurisdictions, which include a section on the simplified and streamlined approach for baseline marketing and distribution activities, as well as a section regarding the transfer pricing treatment of hard-to-value intangibles. The profiles reflect the current legislation and practices of each of the jurisdictions.

URL: <https://www.taxathand.com/article/40500/OECD/2025/New-batch-of-transfer-pricing-country-profiles-released-October-2025>

United Kingdom: HMRC updates lists of jurisdictions with qualified status for Pillar Two purposes

The tax authority has updated its lists of jurisdictions with qualified status for Pillar Two purposes and its statutory guidance in *Notice 2—Pillar Two top-up taxes relevant territories and taxes* to specify further jurisdictions with a qualified income inclusion rule and/or a qualifying domestic top-up tax that meets safe harbor standards.

URL: <https://www.taxathand.com/article/40498/United-Kingdom/2025/HMRC-updates-lists-of-jurisdictions-with-qualified-status-for-Pillar-Two-purposes>

United Nations: Tax committee meets for 31st session

The UN Committee of Experts on International Cooperation in Tax Matters has concluded its 31st session. The committee has agreed to establish a subcommittee to undertake work on the UN model tax convention, as well as a subcommittee to update the UN Manual for the Negotiation of Bilateral Tax Treaties. The committee has also agreed to establish other subcommittees and workstreams on topics including extractive industries taxation and the taxation of the digitalized and globalized economy.

URL: <https://www.taxathand.com/article/40514/United-Nations/2025/UN-tax-committee-meets-for-31st-session>

United States: One Big Beautiful Bill Act (OBBBA): 5 key considerations for CFOs

Deloitte Tax LLP has published an article that discusses certain issues that chief financial officers (CFOs) should consider in response to the OBBBA. The new law includes a suite of provisions that affect corporate tax strategy, capital allocation, and financial reporting. Understanding the nuances of these changes can help CFOs effectively navigate the evolving tax landscape and position their organizations for long-term success.

URL: <https://www.taxathand.com/article/40467/United-States/2025/One-Big-Beautiful-Bill-Act-OBBBA-5-key-considerations-for-CFOs>

Various jurisdictions: Global trade updates

Recent announcements and developments for various jurisdictions.

URL: <https://www.taxathand.com/search-results?page=1&tagIds=484>

Various jurisdictions: Tax treaty round up

Recent developments with respect to the following tax treaties and agreements: Australia-Ukraine, Brazil-Chile, Croatia-Saudi Arabia, Greece-United Arab Emirates, Hong Kong SAR-Rwanda, India-Qatar, Japan-Turkmenistan, Latvia-Liechtenstein, Liechtenstein-Montenegro, and Portugal-United Kingdom.

URL: <https://www.taxathand.com/article/40508/United-States/2025/Tax-treaty-round-up-October-2025>

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