



World Tax Advisor

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Australia: Judicial developments in the taxation of nonresident investors

This article discusses two decisions of the Federal Court of Australia, as they relate to the taxation of nonresident investors regarding physical assets located in Australia. The decisions have particular relevance to the power and utilities sector and infrastructure more broadly.

URL: <https://www.taxathand.com/article/40600/Australia/2025/Judicial-developments-in-the-taxation-of-nonresident-investors>

Brazil: Superior Court of Justice allows INE deductions related to prior fiscal years

The Superior Court of Justice has ruled that companies can deduct for corporate income tax purposes interest on net equity (INE) distributions (determined by applying the public long-term interest rate to the company's net equity) that are calculated based on fiscal years prior to the fiscal year the INE distribution is approved by a shareholders' resolution.

URL: <https://www.taxathand.com/article/40613/Brazil/2025/Superior-Court-of-Justice-allows-INE-deductions-related-to-prior-fiscal-years->

European Union: Commission publishes second evaluation of administrative cooperation directives

The European Commission has published the second evaluation of the EU directive on administrative cooperation in taxation (generally referred to as "DAC"), which has expanded through multiple amendments. The evaluation provides an extensive assessment of the directive's operation for the period from 2018 through 2023. To address certain issues, the European Commission plans to consolidate existing DAC amendments into a single streamlined text by mid-2026.

URL: <https://www.taxathand.com/article/40630/European-Union/2025/Commission-publishes-second-evaluation-of-administrative-cooperation-directives>

European Union: ECOFIN fails to agree on revisions to energy tax directive

The Economic and Financial Affairs Council of the European Union failed to reach an agreement at its recent convention regarding the revision of the EU energy taxation directive. The revision would be the first comprehensive update of the directive in over 20 years, reflecting evolving energy and climate challenges.

URL: <https://www.taxathand.com/article/40618/European-Union/2025/ECOFIN-fails-to-agree-on-revisions-to-energy-tax-directive>

Mauritius: QDMTT effective dates and notification deadlines clarified by tax authority

The Mauritius Revenue Authority has issued a communique to clarify that the domestic tax intended to be a qualified domestic minimum top-up tax applies to resident companies forming part of an in-scope multinational enterprise group with a fiscal year ending on or after 1 January 2025. The communique also clarifies filing and payment deadlines, as well as notification requirements.

URL: <https://www.taxathand.com/article/40605/Mauritius/2025/QDMTT-effective-dates-and-notification-deadlines-clarified-by-tax-authority>

Netherlands: House of Representatives adopts bills from 2026 tax plan package

The House of Representatives has adopted amendments to bills that are part of the 2026 tax plan package, which include provisions related to mutual funds, personal income tax, payroll taxes, and environmental taxes. The bills will go to the Senate for a vote. The House of Representatives also passed a motion expressing concern about the current fragmented global implementation of minimum taxation, requesting the government when engaging in international negotiations to endeavor to preserve competitiveness and reduce administrative burdens, among other things.

URL: <https://www.taxathand.com/article/40636/Netherlands/2025/House-of-Representatives-adopts-bills-from-2026-tax-plan-package>

OECD: 2025 edition of Corporate Tax Statistics released

The OECD has released a new edition of *Corporate Tax Statistics*, including a publication and database that provide information on corporate taxation, the activities of multinational enterprises, and BEPS practices. The 2025 edition includes anonymized and aggregated country-by-country (CbC) reporting data, and contains a new disaggregation of CbC reporting data by group size and by tax jurisdiction.

URL: <https://www.taxathand.com/article/40620/OECD/2025/2025-edition-of-Corporate-Tax-Statistics-released>

OECD: Comments invited on tax issues relating to global mobility of individuals

The OECD has released a public consultation document that discusses potential individual income tax and corporate income tax issues that may arise in connection with the global mobility of individuals. Comments are requested by 22 December 2025, and a public consultation meeting is scheduled to be held on 20 January 2026.

URL: <https://www.taxathand.com/article/40622/OECD/2025/Comments-invited-on-tax-issues-relating-to-global-mobility-of-individuals>

Portugal: Standard corporate income tax rate reduced

The standard corporate income tax rate of 20% will be gradually reduced to 17% over the coming fiscal years, with the first reduction (to 19%) applying to fiscal years starting in 2026. For certain small or medium-sized entities, the corporate income tax rate applicable to the first EUR 50,000 of taxable income will be reduced from 16% to 15% for fiscal years starting on or after 1 January 2026.

URL: <https://www.taxathand.com/article/40603/Portugal/2025/Standard-corporate-income-tax-rate-reduced>

Singapore: IRAS releases eighth edition of transfer pricing guidelines

The Inland Revenue Authority of Singapore has published updated transfer pricing guidelines, which generally apply to financial years ending after 31 December 2024. The updated guidance provides an optional simplified and streamlined approach to the application of the arm's length principle, to be introduced on a pilot basis. The guidance also aims to reduce compliance burdens and clarifies certain existing practices.

URL: <https://www.taxathand.com/article/40625/Singapore/2025/IRAS-releases-eighth-edition-of-transfer-pricing-guidelines>

United Kingdom: Key tax highlights of Autumn Budget 2025

The Chancellor of the Exchequer has delivered the Autumn Budget 2025, which aims to boost economic growth, support public services, and address the cost of living. This article provides a high-level overview of the key tax announcements in the budget, including changes to capital allowances, support for entrepreneurship and growth, and business rates reform.

URL: <https://www.taxathand.com/article/40624/United-Kingdom/2025/Key-tax-highlights-of-Autumn-Budget-2025>

United States: Final regulations on corporate stock buyback excise tax released

The Treasury Department and the Internal Revenue Service have released final regulations that provide guidance on the application of the 1% excise tax on repurchases of stock by certain publicly traded corporations. The final regulations modify aspects of previous proposed regulations.

URL: <https://www.taxathand.com/article/40609/United-States/2025/Final-regulations-on-corporate-stock-buyback-excise-tax-released>

United States: Notice 2025-72 provides guidance on allocating foreign taxes

The Treasury Department and the Internal Revenue Service have issued a notice providing guidance on the allocation of foreign income taxes, following the repeal of an Internal Revenue Code section that permitted certain foreign corporations to elect a taxable year beginning one month earlier than the majority US shareholder year for US federal income tax purposes. This article summarizes key aspects of the notice and provides a brief discussion on related forthcoming “qualified business unit” regulations.

URL: <https://www.taxathand.com/article/40638/United-States/2025/Notice-2025-72-provides-guidance-on-allocating-foreign-taxes>

United States: Pillar Two in practice: Seven lessons from the front lines of compliance

Deloitte Tax LLP has published an article that shares Pillar Two insights gathered from polling more than 4,000 tax professionals attending its webcast on guiding multinationals through the compliance life cycle. The article also shares practical steps to strengthen compliance strategies.

URL: <https://www.taxathand.com/article/40619/United-States/2025/Pillar-Two-in-practice-Seven-lessons-from-the-front-lines-of-compliance>

Various jurisdictions: Global trade updates

Recent announcements and developments for various jurisdictions.

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

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