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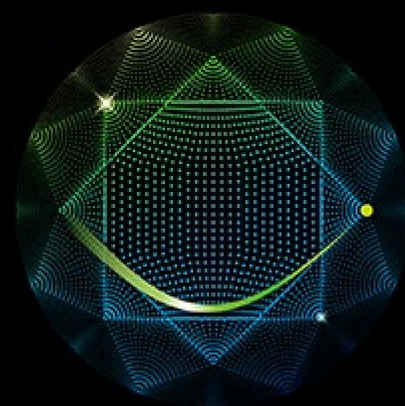
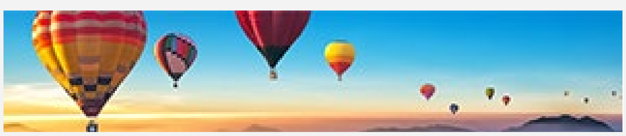
CJEU rules Belgian group contribution regime incompatible with EU PSD

The Court of Justice of the European Union has ruled that Belgium's "group contribution" regime is incompatible with the EU parent-subsidiary directive. The court concluded that receiving both a group contribution and dividends that qualify for the dividends received deduction may effectively result in an indirect tax on dividends, breaching the directive's fiscal neutrality principle.





Indonesia

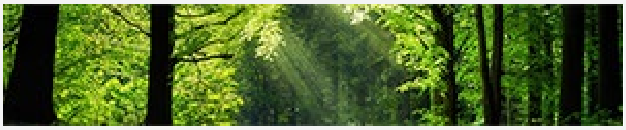
New framework for tax audit regulation implemented

The Minister of Finance has issued an implementing regulation to streamline audit procedures for all taxes under a single framework. The regulation aims to consolidate, simplify, and enhance tax audit procedures, and includes revised audit timelines and stricter document submission requirements.

Israel

Tax authority circular provides guidance on country-by-country reporting obligations

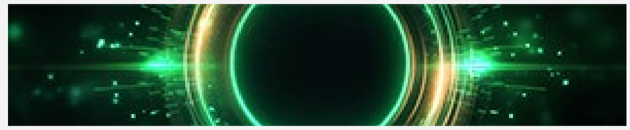
The Israeli Tax Authority has published a tax circular providing guidance on the obligations for multinational groups under the country-by-country reporting requirements introduced in 2022. The circular includes clarifications relating to the submission process, deadlines, and penalties for noncompliance.



Taiwan (China)

Ruling issued on trustee reporting obligations under CFC rules

The Ministry of Finance has ruled that, when individuals or businesses in Taiwan (China) ("Taiwan") use shares or capital from related enterprises in low-tax jurisdictions outside Taiwan as trust property, the trustee must submit an income tax declaration before the end of each January. This article discusses some relevant considerations relating to the reporting obligations.



United Kingdom

Navigating the tax changes in 2025

This article discusses changes to the tax landscape in 2025, including Pillar Two tax compliance requirements, the transition to a modernized research and development regime, various tax-raising measures affecting employers and individual taxpayers, and updates relating to continuing work to close the tax gap and modernize the tax system.

United States

Final regulations on partnership related-party basis shifting transactions: Overview

This article discusses final regulations that identify certain partnership related-party "basis shifting" transactions and substantially similar transactions as transactions of interest (a type of reportable transaction). The topics covered include the types of transactions affected, reporting requirements, and modifications made in response to public comments.

Various jurisdictions

Global trade updates

Recent announcements and developments for various jurisdictions.

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