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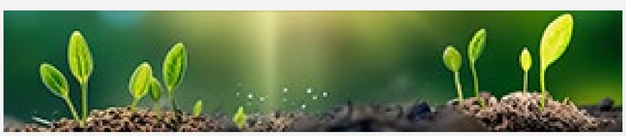
CJEU rules on interpretation of general anti-abuse rule under EU PSD

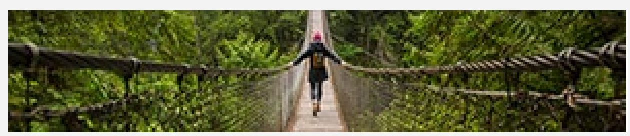
The Court of Justice of the European Union has ruled that the general anti-abuse rule under the EU parent-subsidiary directive (PSD) allows a member state to refuse a tax exemption on dividends received by a parent company if the subsidiary constitutes an artificial arrangement. The court also ruled that all relevant facts and circumstances should be considered, and a tax advantage that defeats the object or purpose of the PSD must be shown.



China

Overview of updated annual enterprise income tax filing forms

This article discusses the updated annual enterprise income tax filing forms applicable for 2024 and onward. The current versions of the forms were published in 2017 and since then have been updated every one or two years. Although the STA's latest updates follow the forms' 2017 framework, the STA has made



Germany

Guidance issued on "transaction matrix" transfer pricing documentation requirements

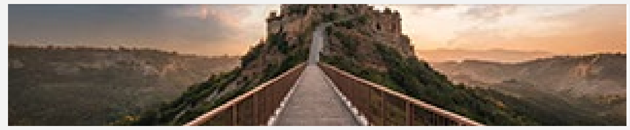
The Ministry of Finance has issued guidance on the requirements of a "transaction matrix," which contains information on a taxpayer's cross-border business relationships with related parties and permanent establishments and is a required part of transfer pricing modifications to multiple forms and clarified certain issues in the filing instructions.

documentation. The transaction matrix was introduced in order to support a more risk-oriented field audit approach.

Switzerland

Key topics in cost-based transfer pricing models

This article discusses the complexities of cost-based transfer pricing models, which have been under increased scrutiny by tax authorities and courts in Switzerland and abroad, and highlights the importance of correctly defining costs and applying profit mark-ups, focusing on practical issues observed in recent tax audits and court decisions.



United Kingdom

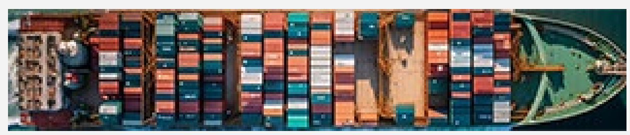
National insurance and business rates bills receive royal assent

Royal assent has been granted for a law that enacts, as from 6 April 2025, several national insurance contribution measures announced in the Autumn Budget 2024, which include an increase in the employer secondary class 1 contribution rate and a decrease in the employer secondary class 1 contribution threshold, as well as a law that enacts certain business rates measures in England.

United States

Highlights of 2024 advance pricing agreement annual report

The Internal Revenue Service has released the advance pricing agreement annual report covering the activities of the Advance Pricing and Mutual Agreement Program during calendar year 2024. The report provides a summary of recent developments and describes the experience, structure, and activities of the program during the calendar year.



Various jurisdictions

Global trade updates

Recent announcements and developments for various jurisdictions.

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