World Tax Advisor

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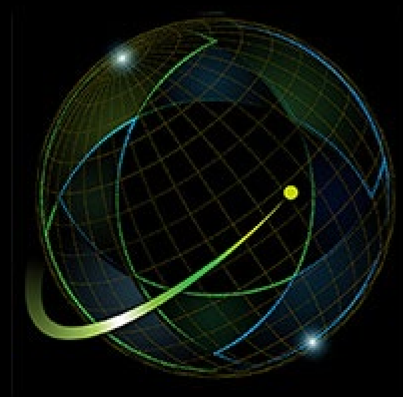
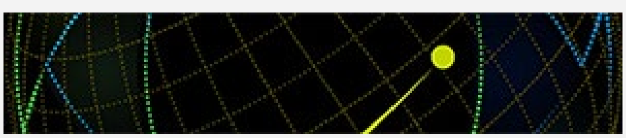
Council of the European Union formally adopts DAC 9

The Council of the European Union has formally adopted a directive ("DAC 9") that amends the directive on administrative cooperation in the field of taxation to assist multinational enterprise groups with their obligations to exchange information as required by the Pillar Two directive. EU member states must transpose DAC 9 into their domestic legislation by 31 December 2025.





Czech Republic

Potential implications of delays in approval of amendments to Top-Up Taxes Act

Proposed amendments would extend the deadlines for filing both the tax return and the information return on the Czech top-up tax, so that the deadlines for the first reporting period

France

Administrative Supreme Court rules controlled foreign company rules are compatible with tax treaties

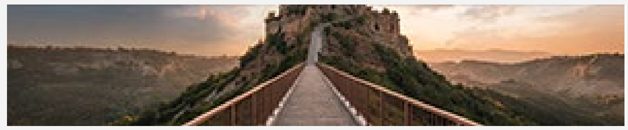
This article discusses a case in which the Administrative Supreme Court ruled that the French controlled foreign company rules are compatible with the provisions of the tax would be no earlier than 30 June 2026. However, if the approval of the amendments is delayed, taxpayers within the scope of the top-up tax could be subject to related obligations in 2025.

treaty between France and Mauritius. By extension, the decision supports the position that the rules are compatible with most tax treaties concluded by France.

Germany

Incoming government publishes draft coalition agreement with broad tax policy goals

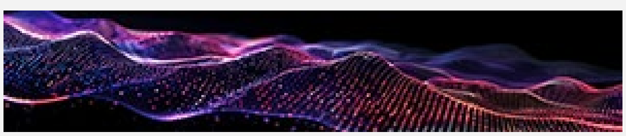
The incoming government has published a draft coalition agreement that sets out its policy goals. Although there are few details on tax policy, the draft agreement offers some insight into what can be expected and some specific measures, including a proposed reduction in the federal corporate income tax rate by 1% annually during the period from 2028 to 2032.



OECD

Statement released on outcomes of inclusive framework’s 17th plenary meeting

A public statement from the OECD/G20 Inclusive Framework on BEPS has been released on the key outcomes of the 17th plenary meeting. The topics discussed during the meeting include the two-pillar solution to address the tax challenges arising from the digitalization and globalization of the economy, the implementation of the BEPS project, and the future agenda of the inclusive framework.



Taiwan (China)

Update to filing instructions for country-by-country reporting released

This article discusses an update to the filing instructions for country-by-country reporting, based on OECD guidance. For Taiwanese multinational enterprise groups that are subject to the global minimum tax (GloBE) regulations starting in fiscal year 2024, the update to the filing instructions may affect the

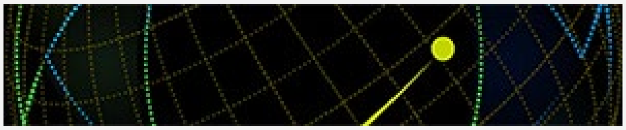
United States

Congress overturns “DeFi” digital asset reporting regulations

The president has signed into law a joint resolution providing for congressional disapproval of regulations under section 6045 of the Internal Revenue Code titled “Gross Proceeds Reporting by Brokers that Regularly Provide Services Effectuating Digital Asset Sales.” The congressional disapproval causes

GloBE safe harbor test during the transition period.

the regulations to be treated as though they had never taken effect.



United States

How Pillar Two raises the bar for M&A integration and tax compliance

A publication from Deloitte Tax LLP offers guidance for tax leaders on the data, process, technology, and people challenges that may arise when organizations go through mergers and acquisitions and explains how Pillar Two compliance raises the stakes.

Various jurisdictions

Global trade updates

Recent announcements and developments for various jurisdictions.

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