Deloitte.

World Tax Advisor 25 July 2025



World Tax Advisor A world of news with tax@hand

In this issue:

China: New tax credit granted for foreign investors reinvesting distributed profits	2
Colombia: Management fees paid to foreign parent not deductible if no WHT applied	2
European Union: European Commission proposes new own resources for the EU budget	2
Hong Kong SAR: Proposed enhancements to tax concessions for the maritime service industry	2
Ireland: Pre-Budget 2026 submission addresses tax policy issues	3
OECD: Comments invited on toolkit for developing countries regarding pricing of copper	3
OECD: Updates to G20 finance ministers cover topics including international tax cooperation	3
Singapore: Updated e-Tax Guide on taxation of gains or losses from sale of foreign assets issued	3
United States: Publication released on accounting considerations related to the new US tax legislation	4
Various jurisdictions: Global trade updates	4
Various jurisdictions: Tax treaty round up	4

China: New tax credit granted for foreign investors reinvesting distributed profits

The Ministry of Finance, State Taxation Administration, and Ministry of Commerce have jointly issued a bulletin that grants a tax credit to offset withholding tax for foreign investors that use distributed profits for qualified reinvestment in China. This article discusses the highlights of the bulletin and provides examples illustrating the application of the tax credit, as well as its interaction with existing rules allowing for a deferral of withholding tax on similar distributed profits.

URL: https://www.taxathand.com/article/39115/China-Peoples-Republic-of/2025/New-tax-credit-granted-for-foreign-investors-reinvesting-distributed-profits

Colombia: Management fees paid to foreign parent not deductible if no WHT applied

This article discusses a Supreme Administrative Court decision that includes a ruling that payments made by a Colombian subsidiary to its Canadian parent company for administrative and management services were not deductible for income tax purposes, as the subsidiary had not deducted withholding tax from the payments.

URL: https://www.taxathand.com/article/39129/Colombia/2025/Management-fees-paid-to-foreign-parent-not-deductible-if-no-WHT-applied

European Union: European Commission proposes new own resources for the EU budget

The European Commission has unveiled its proposal for the next Multiannual Financial Framework, a dynamic and ambitious budgetary framework for the period from 2028 through 2034 totaling almost EUR 2 trillion. The new framework proposes the introduction of five new own resources relating to the EU Emissions Trading System, Carbon Border Adjustment Mechanism, management of electronic waste, tobacco excise duty, and a Corporate Resource for Europe contribution.

URL: https://www.taxathand.com/article/39111/European-Union/2025/EU-Commission-proposes-new-own-resources-for-the-EU-budget

Hong Kong SAR: Proposed enhancements to tax concessions for the maritime service industry

The government has released an administration paper that includes proposals to enhance the existing tax concessions for the maritime service industry and to introduce a half-rate tax concessionary regime for commodity trading business. The government plans to introduce an amendment bill into the Legislative Council during the first half of 2026, with tax concessions expected to apply to years of assessment beginning on or after 1 April 2025.

URL: https://www.taxathand.com/article/39109/Hong-Kong-SAR/2025/Proposed-enhancements-to-tax-concessions-for-the-maritime-service-industry

Ireland: Pre-Budget 2026 submission addresses tax policy issues

Deloitte Ireland has released a pre-Budget 2026 submission, which proposes measures addressing tax policy issues that could help Ireland to maintain its competitiveness, attract investment, and stimulate genuine domestic growth. These include measures relating to the development of intellectual property within Irish companies, as well as the incentivization of domestic and foreign direct investment. URL: https://www.taxathand.com/article/39113/Ireland/2025/Pre-Budget-2026-submission-available

OECD: Comments invited on toolkit for developing countries regarding pricing of copper

The OECD has invited public comments on a draft toolkit that aims to support developing countries in addressing transfer pricing challenges that may arise when pricing copper, as part of the ongoing work of the OECD and the Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development relating to BEPS and the mining sector. Comments are requested by 5 September 2025. URL: https://www.taxathand.com/article/39090/OECD/2025/Comments-invited-on-toolkit-for-developing-countries-regarding-pricing-of-copper

OECD: Updates to G20 finance ministers cover topics including international tax cooperation

The OECD has released reports presented to the G20 finance ministers and central bank governors that set out recent developments relating to international tax cooperation and the work of the Inclusive Forum on Carbon Mitigation Approaches, as well as a report on the progress on transparency and exchange of information for tax purposes since the inception of the G20.

URL: https://www.taxathand.com/article/39119/OECD/2025/Updates-to-G20-finance-ministers-cover-topics-including-international-tax-cooperation

Singapore: Updated e-Tax Guide on taxation of gains or losses from sale of foreign assets issued

The Inland Revenue Authority of Singapore has published an updated edition of its e-Tax Guide on the income tax treatment of gains and losses from the sale of foreign assets. A frequently asked question regarding promissory notes received as consideration for the sale of a foreign asset has been removed from the guide, pending further review.

URL: https://www.taxathand.com/article/39110/Singapore/2025/Updated-e-Tax-Guide-on-taxation-of-gains-or-losses-from-sale-of-foreign-assets-issued

United States: Publication released on accounting considerations related to the new US tax legislation

Deloitte Tax LLP has released a publication that discusses the accounting for income tax effects of the new legislation commonly referred to as the "One Big Beautiful Bill Act." The publication considers certain business tax provisions of the legislation, especially those that may have a more substantive effect on financial statements in the period of the legislation's enactment.

URL: https://www.taxathand.com/article/39105/United-States/2025/Heads-Up-Accounting-Considerations-Related-to-the-New-U-S-Tax-Legislation

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: Andorra-Latvia, Andorra-Montenegro, Bahrain-Oman, Croatia-Liechtenstein, India-Oman, and Japan-Ukraine.

URL: https://www.taxathand.com/article/39124/United-States/2025/Tax-treaty-round-up-July-2025

World Tax Advisor | 25 July 2025

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms or their related entities (collectively, the "Deloitte organization") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

About Deloitte

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte provides leading professional services to nearly 90% of the Fortune Global 500[®] and thousands of private companies. Our people deliver measurable and lasting results that help reinforce public trust in capital markets and enable clients to transform and thrive. Building on its 180-year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte's approximately 460,000 people worldwide make an impact that matters at www.deloitte.com.

Copyright © 2025 Deloitte Development LLC. All rights reserved.