



World Tax Advisor
A world of news with tax@hand

In this issue:

Cambodia: Capital gains tax guidance addresses treatment of retained earnings2

Malaysia: Update on implementation of “New Incentive Framework”2

Mexico: Tax incentive for film and audiovisual production introduced.....2

New Zealand: Inland Revenue continues to focus on transfer pricing reviews.....2

OECD: Carbon pricing database updated, “country notes” on effective carbon rates released3

Various jurisdictions: Global trade updates3

Various jurisdictions: Tax treaty round up3

Cambodia: Capital gains tax guidance addresses treatment of retained earnings

This article discusses a prakas issued by the Ministry of Economy and Finance that updates certain rules and procedures for imposing and collecting capital gains tax, including provisions related to the tax treatment of retained earnings when shares are sold or transferred. The changes are generally effective as from 1 January 2026.

URL: <https://www.taxathand.com/article/40971/Cambodia/2026/Capital-gains-tax-guidance-addresses-treatment-of-retained-earnings>

Malaysia: Update on implementation of “New Incentive Framework”

The Ministry of Investment, Trade and Industry has announced that the government will implement the “New Incentive Framework” (NIF) for the manufacturing sector, effective as from 1 March 2026. The NIF offers tax incentives for Malaysian resident companies that fulfill certain conditions, and will be extended to the services sector in the second quarter of 2026. Guidelines on the NIF for the manufacturing sector and a set of frequently asked questions have also been released.

URL: <https://www.taxathand.com/article/40953/Malaysia/2026/Update-on-implementation-of-New-Incentive-Framework>

Mexico: Tax incentive for film and audiovisual production introduced

A decree has been published in the official gazette that provides for a tax credit of up to 30% of total costs for film and audiovisual production projects completed in Mexico (capped at MXN 40 million per production and per taxpayer). The incentive is available to residents and nonresidents, and the tax credit may be transferred (in whole or in part) for consideration, subject to certain conditions.

URL: <https://www.taxathand.com/article/40954/Mexico/2026/Tax-incentive-for-film-and-audiovisual-production-introduced>

New Zealand: Inland Revenue continues to focus on transfer pricing reviews

This article discusses Inland Revenue’s continuing focus on transfer pricing, including its follow-up with certain taxpayers in relation to a compliance campaign launched in October 2025. The article also provides a list of areas that led to further questions, such as use of the profit split method, significant transactions or events not adequately explained or covered in transfer pricing documentation, and material cross-border associated party transactions with low-tax jurisdictions.

URL: <https://www.taxathand.com/article/40943/New-Zealand/2026/Inland-Revenue-continues-to-focus-on-transfer-pricing-reviews>

OECD: Carbon pricing database updated, “country notes” on effective carbon rates released

The OECD has released an update to the Carbon Pricing and Energy Taxation Database, which is intended to track developments relating to energy taxation and carbon pricing across a broad set of jurisdictions and now includes data up to 2023. The OECD has also released “country notes” summaries for jurisdictions examined in the November 2025 report *Effective Carbon Rates 2025: Recent Trends in Taxes on Energy Use and Carbon Pricing*.

URL: <https://www.taxathand.com/article/40939/OECD/2026/Carbon-pricing-database-updated-country-notes-on-effective-carbon-rates-released>

Various jurisdictions: Global trade updates

Recent announcements and developments for various jurisdictions, including an update on US tariffs after a Supreme Court ruling.

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 and agreements: Austria-Oman, Hong Kong SAR-Türkiye, Italy-Kosovo, and Singapore-Taiwan (China).

URL: <https://www.taxathand.com/article/40968/United-States/2026/Tax-treaty-round-up-February-2026>

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 over 470,000 people worldwide work together every day to make an impact that matters at www.deloitte.com.