



World Tax Advisor

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In this issue:

Australia: ATO issues updated guidance on transfer pricing issues related to inbound distribution arrangements.....	2
Kuwait: Updates to 5% tax retention rules on certain payments made by government entities.....	2
Malta: Summary of Budget Measures Implementation Act 2026.....	2
New Zealand: Thin capitalization infrastructure exemption introduced.....	2
OECD: Report indicates that taxes on labor income rose across OECD jurisdictions in 2025.....	2
United Arab Emirates: Rules updated on tax procedures and administrative penalties.....	3
United Kingdom: Court of Appeal dismisses HMRC's appeal on application of treaty main purpose test.....	3
United States: Tax basis step-up considerations in M&A transactions	3
Various jurisdictions: Global trade updates	3

Australia: ATO issues updated guidance on transfer pricing issues related to inbound distribution arrangements

The Australian Taxation Office (ATO) has issued updated guidance on transfer pricing issues related to inbound distribution arrangements. The updated guidance revises the ATO's profit markers for distributors in the information and communication technology and life science industries. The scope of the application of the guidance is also revised, by changing its definition of "distributor."

URL: <https://www.taxathand.com/article/41211/Australia/2026/ATO-issues-updated-guidance-on-TP-issues-related-to-inbound-distribution-arrangements>

Kuwait: Updates to 5% tax retention rules on certain payments made by government entities

The Ministry of Finance has published executive rules for the 2026-2027 state budget, which include an exemption from the 5% tax retention requirement on payments made by government entities to multinational entities that are registered under the domestic minimum top-up tax law.

URL: <https://www.taxathand.com/article/41213/Kuwait/2026/Updates-to-5-tax-retention-rules-on-certain-payments-made-by-government-entities>

Malta: Summary of Budget Measures Implementation Act 2026

This article discusses the 2026 budget implementation legislation, which is generally effective as from 1 January 2026 and includes key legislative provisions regarding special limited partnership funds and a new tax deduction for expenditure incurred on research, development, and innovation activities.

URL: <https://www.taxathand.com/article/41208/Malta/2026/Budget-Measures-Implementation-Act-2026-introduced>

New Zealand: Thin capitalization infrastructure exemption introduced

The government has introduced a new infrastructure exemption from the thin capitalization rules, which is aimed at improving New Zealand's attractiveness to foreign infrastructure investors. The exemption may allow qualifying infrastructure entities to fully deduct interest expenditure on third party, limited recourse debt, and applies as from the 2026/27 income year.

URL: <https://www.taxathand.com/article/41176/New-Zealand/2026/Thin-capitalization-infrastructure-exemption-introduced>

OECD: Report indicates that taxes on labor income rose across OECD jurisdictions in 2025

The OECD has released a report that provides details on taxes paid on wages in OECD member jurisdictions and allows cross-jurisdiction comparisons relating to labor costs and the overall tax and benefit position of different types of households. The report indicates that in 2025, effective tax rates increased for the eight types of households examined in the report "on average across the OECD for the first time since 2022."

URL: <https://www.taxathand.com/article/41197/OECD/2026/Report-indicates-that-taxes-on-labor-income-rose-across-OECD-jurisdictions-in-2025>

United Arab Emirates: Rules updated on tax procedures and administrative penalties

Cabinet decisions have been issued that update the executive regulations on tax procedures, as well as the rules regarding administrative penalties for violations of tax laws. This article discusses key updates and how they may affect businesses in their daily operations, as well as the current risks involved with tax noncompliance.

URL: <https://www.taxathand.com/article/41212/United-Arab-Emirates/2026/Rules-updated-on-tax-procedures-and-administrative-penalties>

United Kingdom: Court of Appeal dismisses HMRC's appeal on application of treaty main purpose test

The Court of Appeal has dismissed the tax authority's appeal in a case involving a payment of UK-source interest arising on a debt assigned to an Irish resident taxpayer. The court ruled that a main purpose test within the interest article of the 1976 Ireland-UK tax treaty did not prevent the Irish resident taxpayer from being entitled to treaty relief from UK withholding tax.

URL: <https://www.taxathand.com/article/41202/United-Kingdom/2026/Court-of-Appeal-dismisses-HMRCs-appeal-on-application-of-treaty-main-purpose-test>

United States: Tax basis step-up considerations in M&A transactions

Deloitte Tax LLP has released *Tax basis step-up considerations in M&A transactions*, which explores strategic considerations, structural alternatives, and practical implementation approaches for tax basis step-up opportunities in merger and acquisition transactions.

URL: <https://www.taxathand.com/article/41198/United-States/2026/M-A-Tax-Talk-Tax-basis-step-up-considerations-in-M-A-transactions>

Various jurisdictions: Global trade updates

Recent announcements and developments for various jurisdictions.

URL: <https://www.taxathand.com/search-results?page=1&tagIds=484>

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