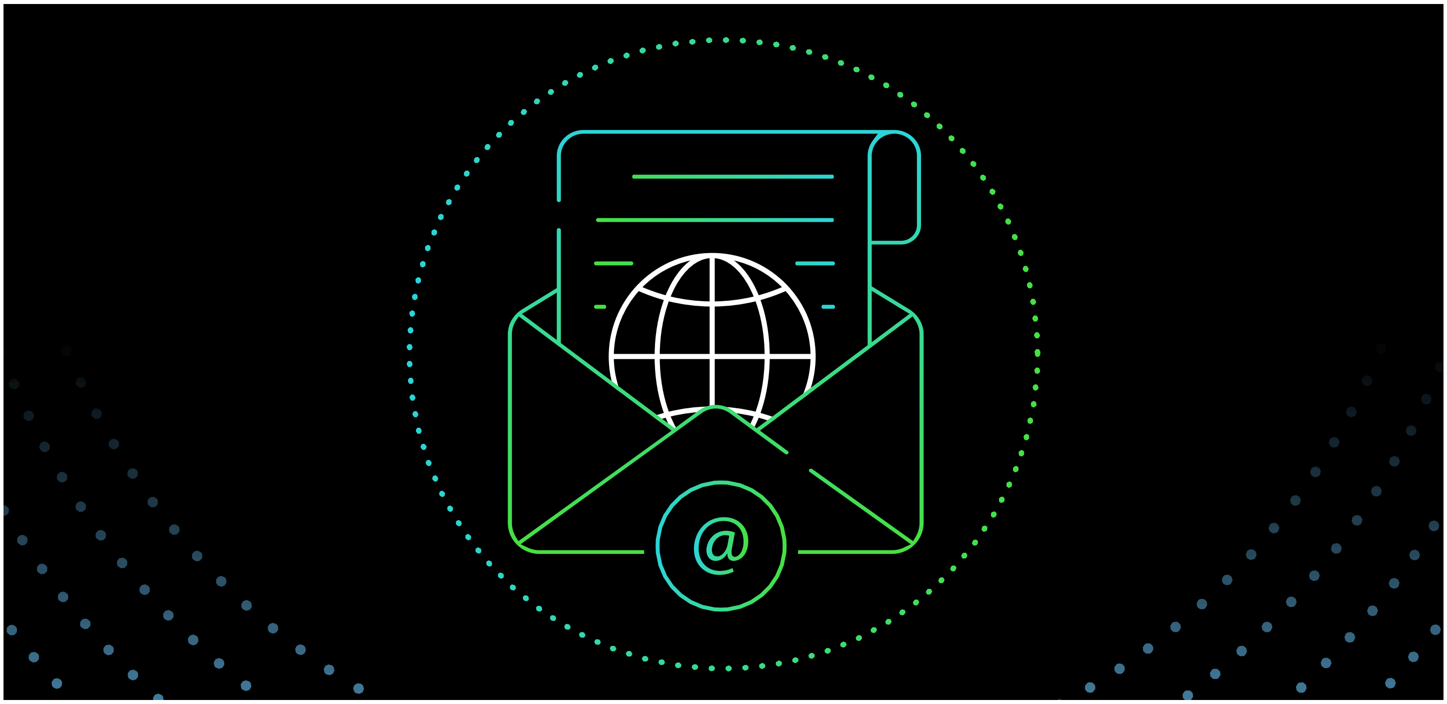

World Tax Advisor

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In this issue:

Belgium: Social security applicable on RSUs granted by a foreign parent company

This article discusses a decision in which the Supreme Court ruled that restricted stock units granted by a foreign parent company to employees of its Belgian affiliate constitute salary subject to Belgian social security contributions, overturning the Antwerp labor court's previous position.

URL: https://www.taxathand.com/article/41641/Belgium/2026/Social-security-applicable-on-RSUs-granted-by-a-foreign-parent-company

Germany: Government approves draft Annual Tax Act 2026

The government has approved the draft Annual Tax Act 2026, which includes the implementation of key elements of the OECD Pillar Two "side-by-side" package, as well as amendments related to withholding tax procedures, the purchase price allocation for real estate, and changes regarding VAT consolidated groups.

URL: https://www.taxathand.com/article/41652/Germany/2026/Government-approves-draft-Annual-Tax-Act-2026

Ghana: Key tax and regulatory highlights of the 2026 mid-year budget review

The Minister for Finance has presented the Mid-Year Fiscal Policy Review of the 2026 Budget Statement and Economic Policy of the Government of Ghana to parliament, which focuses on strengthening revenue administration, improving compliance, reducing revenue leakages, and implementing ongoing reforms without introducing new taxes or increasing tax rates.

URL: https://www.taxathand.com/article/41663/Ghana/2026/Key-tax-and-regulatory-highlights-of-the-2026-mid-year-budget-review

Malaysia: IRB guidelines available on CGT exemption for disposals of shares for purpose of IPO

The Inland Revenue Board has released technical guidelines to provide clarifications on the exemption from capital gains tax for the disposal of shares in relation to an initial public offering. The guidelines also set forth the procedures to apply for the exemption.

URL: https://www.taxathand.com/article/41664/Malaysia/2026/IRB-guidelines-available-on-CGT-exemption-for-disposals-of-shares-for-purpose-of-IPO

Philippines: Terms and conditions established regarding enhanced deductions regime for RBEs

The Fiscal Incentives Review Board has formalized an order from the Department of Finance that establishes the guidelines, rules, and regulations governing the enhanced deductions regime available to qualified registered business enterprises.

URL: https://www.taxathand.com/article/41644/Philippines/2026/Terms-and-conditions-established-regarding-enhanced-deductions-regime-for-RBEs

South Africa: SARS finalizes APA rules, as pilot program goes live

The South African Revenue Service (SARS) has issued, through public notices, final legislation governing the long-awaited advance pricing agreement (APA) program. An exclusive pilot program is being launched to provide upfront tax certainty for multinational enterprises that meet certain eligibility requirements. SARS has also published an APA guide and will accept requests to participate in the APA pilot program as from 1 September 2026.

URL: https://www.taxathand.com/article/41651/South-Africa/2026/SARS-finalizes-APA-rules-as-pilot-program-goes-live

United Arab Emirates: FTA issues registration and deregistration deadlines for top-up tax purposes

The Federal Tax Authority (FTA) has issued a decision that provides deadlines for multinational enterprise group entities to register and deregister for Pillar Two top-up tax purposes, as well as to notify the FTA when their in-scope status changes. The decision is effective for fiscal years starting on or after 1 January 2025.

URL: https://www.taxathand.com/article/41657/United-Arab-Emirates/2026/FTA-issues-registration-and-deregistration-deadlines-for-top-up-tax-purposes

United States: Regulations proposed on CFC tax year changes, 10% disallowance of FTCs on section 951A PTEP

Proposed regulations have been released on the allocation of certain foreign income taxes for specified foreign corporations affected by the repeal of a provision allowing the corporation to elect a taxable year beginning one month earlier than its majority US shareholder's year. The proposed regulations would also implement a 10% disallowance of certain foreign tax credits with respect to taxes paid, accrued, or deemed paid on distributions of certain previously taxed earnings and profits. Comments and hearing requests are due by 17 September 2026.

URL: https://www.taxathand.com/article/41654/United-States/2026/Regs-proposed-on-CFC-tax-year-changes-10-disallowance-of-FTCs-on-section-951A-PTEP

Various jurisdictions: Global trade updates

Recent announcements and developments for various jurisdictions.

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