



World Tax Advisor
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Cyprus: Tax authorities withdraw 2017 ASP CRS guidance

The Tax Department has withdrawn certain 2017 guidance relating to administrative service providers and their obligations under the OECD Common Reporting Standard (CRS). Administrative service providers are now required to evaluate their CRS classification based on the consolidated text of the CRS, along with the applicable Cyprus CRS legislative and regulatory framework. The Tax Department has indicated that it may carry out audits to verify compliance with CRS obligations.

URL: <https://www.taxathand.com/article/41774/Cyprus/2026/Tax-authorities-withdraw-2017-ASP-FATCACRS-guidance>

European Union: CJEU rules on neutralization of dividend withholding tax restriction by tax treaties

The Court of Justice of the European Union has ruled that a discriminatory dividend withholding tax imposed on a tax-transparent fund can be considered “neutralized” by a bilateral tax treaty only if the fund’s unitholders can effectively and entirely offset the discriminatory portion of the withholding tax against the tax they owe in their state of residence.

URL: <https://www.taxathand.com/article/41781/European-Union/2026/CJEU-rules-on-neutralization-of-dividend-withholding-tax-restriction-by-tax-treaties>

Greece: Interest on intragroup loans obtained for dividend distributions is not deductible

The Second Chamber of the Council of State (“council”) has dismissed the appeal of a company that sought to deduct interest on intragroup loans used to pay dividends when it lacked sufficient cash reserves. The council ruled that the dividend payments arose from the company-shareholder relationship, not the company’s business activity, so the related interest was not tax deductible.

URL: <https://www.taxathand.com/article/41778/Greece/2026/Interest-on-intragroup-loans-obtained-for-dividend-distributions-is-not-deductible>

OECD: Updated version of OECD model tax treaty released

The OECD has published an updated version of the OECD model tax treaty, which updates the previous 2017 version to incorporate the changes previously agreed and published by the OECD in November 2025. These updates notably include the additions to the commentary to article 5 on the definition of a “fixed place of business” permanent establishment in situations of cross-border remote working.

URL: <https://www.taxathand.com/article/41808/OECD/2026/Updated-version-of-OECD-model-tax-treaty-released>

Singapore: IRAS releases guidance on proposed EIS enhancements for AI adoption

The Inland Revenue Authority of Singapore has updated its Enterprise Innovation Scheme guidance to provide further details on the enhancements announced in Budget 2026, including the proposed extension of the incentive scheme to cover artificial intelligence adoption as a new qualifying activity for years of assessment 2027 and 2028.

URL: <https://www.taxathand.com/article/41796/Singapore/2026/IRAS-releases-guidance-on-proposed-EIS-enhancements-for-AI-adoption>

United States: Notice 2026-61 further extends section 871(m) phase-in period

The Treasury Department and the Internal Revenue Service have published a notice that extends transition relief through 2028 for the phase-in period for enforcement and administration of the Internal Revenue Code section 871(m) regulations on withholding on US-source dividend-equivalent payments.

URL: <https://www.taxathand.com/article/41786/United-States/2026/Notice-2026-61-further-extends-section-871m-phase-in-period>

Various jurisdictions: Looking into the future of tax: Three roles, four enablers, one direction

Deloitte Tax LLP has released a publication that discusses how tax leaders can act now to build artificial intelligence-enabled, data-driven tax functions that modernize operations, shape enterprise decisions, and adapt to a changing economy.

URL: <https://www.taxathand.com/article/41788/United-States/2026/Looking-into-the-future-of-tax-Three-roles-four-enablers-one-direction>

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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