

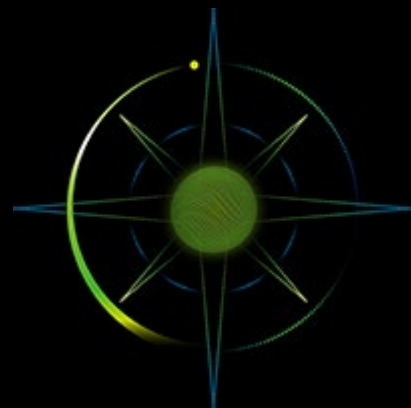
World Tax Advisor

A world of news with tax@hand.



OECD Pillar One Amount A public consultation: Observations and comments

As part of the ongoing work on a two-pillar solution to address the tax challenges arising from the digitalization of the economy, the OECD has published a consultation document that contains draft domestic model rules for the new “Amount A” taxing right under Pillar One. This article provides details and commentary with respect to the draft model rules.



Australia

Update on EBITDA interest and royalty measures

The Parliamentary Budget Office has released the “2022 Election commitments report,” which includes details on the Labor Party proposals to introduce an interest deduction limitation rule based on EBITDA and to deny deductions for certain royalty payments.

Brazil

Software license royalties paid to foreign indirect shareholder not deductible

The Superior Chamber of Tax Appeals has ruled that royalties paid by a Brazilian entity to its foreign indirect parent company for a license to distribute and commercialize software are nondeductible for corporate income tax purposes.



European Union

European Commission publishes Annual Report on Taxation 2022

The European Commission has published its Annual Report on Taxation 2022, which provides an analysis of tax policies in the EU. The report evaluates recent trends in tax systems and identifies how tax policy, implementation, or compliance could be improved across the EU.



France

Foreign tax credits may offset tax due on dividend lump sum add-back

The Supreme Administrative Court has nullified the tax authorities' guidelines that stated that the add-back of a 5% lump sum on dividends that are tax exempt under the participation exemption regime could not be treated as a tax paid on part of the dividends, thus denying the use of foreign tax credits to offset the tax due on the lump sum.



India

ITAT rules that reimbursement of secondees' salaries is not taxable as FTS

The Bangalore Bench of the Income-tax Appellate Tribunal has ruled that a reimbursement by an Indian company of the salaries of employees seconded to the company by an overseas group entity does not constitute fees for technical services subject to tax in India in a case where tax already has been deducted on the reimbursed amount as salary income.



Israel

Guidance issued to banks on withholding VAT at source on import of intangible assets

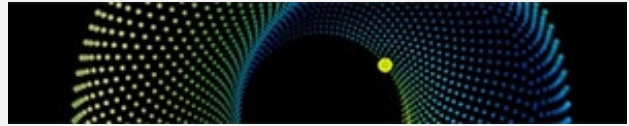
The Israeli Tax Authority has issued new guidelines to the banking sector, which are effective retroactively as from 1 January 2022 and provide that a bank must withhold VAT at a rate of 17% on payments by Israeli customers to suppliers for the importation of intangible assets, such as digital subscriptions and software as a service (SaaS), at the time of payment.



Luxembourg

Super deduction proposed for R&D, digital transformation, environmental transition

The Chamber of Commerce has submitted a proposal to the Minister of Finance that would allow certain taxpayers to claim an additional 50% to 100% super deduction for their eligible research and development expenses and costs associated with their digital transformation and ecological and environmental transition.



Malaysia

Significant additional transfer pricing disclosures required for YA 2022

The Inland Revenue Board has released an updated sample of the income tax return form for companies for year of assessment 2022 that requires significant additional transfer pricing disclosures, which primarily relate to entity characterization, business restructurings, research and development activity, and the ownership of trade names or brand names and intellectual property.



New Zealand

What tax reform to expect through to Election 2023

This article summarizes some key tax developments expected over the next year, which include developments relating to the taxation of certain share sales, an extension of the scope of the personal services income attribution rules, and improvements to the tax system.



Singapore

IRAS publishes advance ruling on transfer as going concern, balancing charge deferral

The Inland Revenue Authority of Singapore has published an advance ruling summary that addresses whether the transfer of a company's operating business as a going concern to a newly incorporated Singapore company is a capital transaction and whether an election may be made to defer any balancing charge arising for tax purposes on the transfer of qualifying assets.

Have you visited Deloitte tax@hand?

Tax reform. Unprecedented change. Unique challenges. This is the future of tax. How can you stay ahead? Understand what changes are unfolding in the global tax landscape. Be informed so that you can turn change into opportunity. For the latest tax news and information from over 80 countries, [visit tax@hand](#) or [download](#) the tax@hand mobile app today.

Helpful Resources

[Subscribe to World Tax Advisor](#)

[World Tax Advisor archives](#)

[COVID-19 response hub for tax and legal leaders](#)

[Business Tax](#)

[Deloitte International Tax Source](#)

[Join Dbriefs](#)

[Follow us on Twitter](#)

Have a question?

If you have any questions about the content in *World Tax Advisor*, please email [Karen Ebert](#) or [Alison Brock](#).

Did someone forward you this message? Skip the grapevine. Receive this newsletter email by clicking on the [subscribe](#) link above to hear it first.

[Deloitte.com](#) | [Legal](#) | [Privacy](#)

30 Rockefeller Plaza
New York, NY 10112-0015
United States

© 2022. For information, contact Deloitte Touche Tohmatsu Limited.



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 industry-leading audit and assurance, tax and related services, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our professionals deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte’s more than 345,000 people worldwide make an impact that matters at www.deloitte.com.

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.