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Australia: ATO releases final guidance on third party debt test and related restructures

The Australian Taxation Office (ATO) has released a final ruling providing guidance on the requirements a debt interest issued by an entity must meet to satisfy the new third party debt test under the new interest limitation rules. The ATO has also released an update to the practical compliance guideline on restructures and the thin capitalization and debt deduction creation rules.

URL: <https://www.taxathand.com/article/40414/Australia/2025/ATO-releases-final-guidance-on-third-party-debt-test-and-related-restructures>

Australia: Tax governance for Top 100 and Top 1,000 taxpayers

The ATO has published its findings reports from the Top 100 and Top 1,000 justified trust assurance programs undertaken in the year ended 30 June 2025, which may assist businesses in proactively managing tax risk and preparing for an upcoming review. This article provides a summary of the findings and discusses the ATO's key areas of focus.

URL: <https://www.taxathand.com/article/40410/Australia/2025/Tax-governance-for-Top-100-and-Top-1000-taxpayers-Latest-developments>

Bermuda: Consultation paper proposes technical amendments to Corporate Income Tax Act

This article discusses a consultation paper on the second set of proposed technical amendments to the Corporate Income Tax Act 2023, which applies to Bermuda constituent entity groups for fiscal years starting on or after 1 January 2025. The consultation paper includes an outline of the proposed amendments and draft legislation, with the amendments aiming to clarify certain provisions and better align the legislation with the OECD Pillar Two model rules.

URL: <https://www.taxathand.com/article/40416/Bermuda/2025/Consultation-paper-proposes-technical-amendments-to-Corporate-Income-Tax-Act>

OECD: Comments published on toolkit for developing countries regarding pricing of copper

The OECD has published responses from multiple stakeholders to an invitation for public comments on a draft toolkit that aims to support developing countries in addressing transfer pricing challenges that may arise when pricing minerals, with a focus on copper.

URL: <https://www.taxathand.com/article/40415/OECD/2025/Comments-published-on-toolkit-for-developing-countries-regarding-pricing-of-copper>

Thailand: Rules provided for incentives to attract highly skilled Thai nationals working abroad

A notification from the Revenue Department sets forth rules, procedures, and conditions for corporate and individual income tax incentives that aim to encourage highly skilled Thai nationals with international work experience to return to work in Thailand for a qualifying company or qualifying juristic partnership operating a business in a targeted industry.

URL: <https://www.taxathand.com/article/40433/Thailand/2025/Rules-provided-for-incentives-to-attract-highly-skilled-Thai-nationals-working-abroad>

United States: Notice 2025-46 provides interim guidance on CAMT application to domestic corporations

The Treasury Department and the Internal Revenue Service have released a notice providing interim guidance on the application of the corporate alternative minimum tax (CAMT) to domestic corporate transactions, financially troubled companies, and tax consolidated groups. The notice announces the intent to partially withdraw existing proposed CAMT regulations and issue revised proposed regulations similar to the guidance described in the notice.

URL: <https://www.taxathand.com/article/40427/United-States/2025/Notice-2025-46-provides-interim-guidance-on-CAMT-application-to-domestic-corporations>

United States: Treasury and IRS announce withdrawal of proposed regulations on spin-off transactions

The Treasury Department and the Internal Revenue Service have announced the withdrawal of two sets of proposed regulations on spin-off transactions under section 355 of the Internal Revenue Code and related multi-year reporting requirements. A revenue procedure has also been issued that provides procedures for taxpayers requesting private letter rulings regarding certain issues relating to section 355 transactions.

URL: <https://www.taxathand.com/article/40412/United-States/2025/Treasury-and-IRS-announce-withdrawal-of-proposed-regulations-on-spin-off-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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