



World Tax Advisor
A world of news with tax@hand

In this issue:

Australia: High Court decides in favor of PepsiCo2

Belgium: New cap on employer social security contributions for high earners.....2

Germany: Local tax court provides guidance on income tax treatment of meme coin transactions.....2

Germany: MOF issues second revised version of draft bill to update Pillar Two rules2

Malaysia: IRB updates guidelines on capital gains tax for unlisted shares3

United Kingdom: Legislative changes for umbrella companies: A new era of joint and several liability3

United Nations: UN tax convention and early protocols: A deep dive into the debates3

Various jurisdictions: Global trade updates3

Australia: High Court decides in favor of PepsiCo

The High Court has ruled in favor of the taxpayer that certain payments were for the acquisition of concentrate only and were not royalties (consideration for the use of intellectual property) based on an objective construction of the relevant agreements. The court also ruled that the taxpayer was not liable for royalty withholding tax or diverted profits tax in relation to the matters in dispute.

URL: <https://www.taxathand.com/article/40217/Australia/2025/High-Court-decides-in-favor-of-PepsiCo>

Belgium: New cap on employer social security contributions for high earners

This article discusses a new exemption from employer contributions to the National Social Security Office on employee earnings above a certain salary threshold. The threshold and further details are to be outlined in a royal decree. The purpose of the measure is to enhance Belgium's international competitiveness for highly paid knowledge jobs, curb the shift to other non-contributory forms of remuneration for employees, and limit the transition to self-employed status for highly paid employees.

URL: <https://www.taxathand.com/article/40232/Belgium/2025/New-cap-on-employer-social-security-contributions-for-high-earners>

Germany: Local tax court provides guidance on income tax treatment of meme coin transactions

The lower tax court of Nuremburg has ruled that cryptocurrencies, including meme coins, generally must be treated as assets for tax purposes, and capital gains arising from the sale of such cryptocurrencies may be taxable as "other income." The court also ruled that the tax authorities have the ability to enforce tax law provisions with respect to cryptocurrency transactions.

URL: <https://www.taxathand.com/article/40209/Germany/2025/Local-tax-court-provides-guidance-on-income-tax-treatment-of-meme-coin-transactions>

Germany: MOF issues second revised version of draft bill to update Pillar Two rules

The Ministry of Finance has published the second revised version of a draft bill that includes proposed updates to the Pillar Two minimum taxation rules, based on OECD Pillar Two administrative guidance. The draft bill also no longer includes certain provisions related to the elimination of the double deduction rule for partnerships, and incorporates various controlled foreign company rules, among other things.

URL: <https://www.taxathand.com/article/40224/Germany/2025/MOF-issues-second-revised-version-of-draft-bill-to-update-minimum-taxation-rules>

Malaysia: IRB updates guidelines on capital gains tax for unlisted shares

The Inland Revenue Board has released updated guidelines on capital gains tax for unlisted shares. The guidelines have been updated mainly to reflect legislative changes to the income tax provision that deems certain gains or profits accruing from the disposal of shares of a controlled company incorporated outside Malaysia to be derived from Malaysia under certain circumstances.

URL: <https://www.taxathand.com/article/40226/Malaysia/2025/IRB-updates-guidelines-on-capital-gains-tax-for-unlisted-shares>

United Kingdom: Legislative changes for umbrella companies: A new era of joint and several liability

This article discusses proposed legislation that would impose on an “umbrella” company and certain “relevant parties” a new concept of joint and several liability where the umbrella company is engaged in the supply of a worker. The tax authorities would pursue the relevant party in the first instance for the settlement of any income tax, national insurance contributions, and apprenticeship levy debt in the event of any noncompliance with the pay as you earn regulations.

URL: <https://www.taxathand.com/article/40182/United-Kingdom/2025/Legislative-changes-for-umbrella-companies-A-new-era-of-joint-and-several-liability>

United Nations: UN tax convention and early protocols: A deep dive into the debates

The recent United Nations intergovernmental negotiating committee sessions in New York focused on the UN framework convention on international tax cooperation and two early protocols that address cross-border services income taxation and the prevention and resolution of tax disputes. The discussions revealed a divergence in approaches, highlighting the complexities of achieving consensus on these issues.

URL: <https://www.taxathand.com/article/40233/United-Nations/2025/UN-tax-convention-and-early-protocols-A-deep-dive-into-the-debates>

Various jurisdictions: Global trade updates

Recent announcements and developments for various jurisdictions.

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

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.

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 leading professional services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our people deliver measurable and lasting results that help reinforce public trust in capital markets and enable clients to transform and thrive. Building on its 180-year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte's approximately 460,000 people worldwide make an impact that matters at www.deloitte.com.