

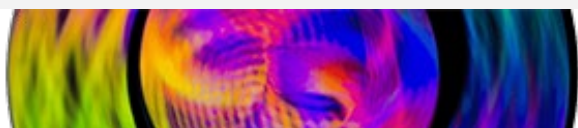


World Tax Advisor

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Income tax regulations updated to implement significant tax changes in Peru

Changes affect intragroup service payments, interest expense, indirect transfers of shares, tax accruals and treatment of noncooperative jurisdictions and preferential tax regimes.



Belgium

ATAD interest deduction limitation rules apply as from 1 January 2019

The bill adopted by parliament also includes anti-fraud provisions that will affect certain arrangements involving zero or low-tax jurisdictions and the exchange of information.



Botswana

Transfer pricing, interest deductibility regimes enacted, IFSC regime amended

The tax authorities expect affected taxpayers to take immediate steps to account for the changes, which may require companies to make additional provisional tax payments.



Denmark

Guidance issued on extension of interest exemption under thin cap rules

Clarification is provided on the application of legislation extending the related-party interest exemption to certain amounts received from debtors in other EU/EEA member states.



European Union

European Commission requests Germany to revise exit tax rules

In the commission's view, rules subjecting certain transfers of assets to a permanent establishment in an EEA member state to an immediate exit tax are too restrictive.



France

Digital services tax proposal to be presented to parliament

The proposed tax would apply at the national level, in the event that discussions at the EU level do not result in the adoption of a directive on a common system of digital services tax.



Portugal

2019 budget law contains corporate, individual and indirect tax changes

The law affects the application of certain tax benefits and filing and payment deadlines, transposes VAT-related EU directives and makes various other changes.



South Africa

VAT e-services regulations amended

Changes from the draft regulations include an exclusion for certain supplies within a group of companies, and an extension of the effective date for the amendments to 1 April 2019.



Thailand

International Business Center regime enacted

Companies benefitting from headquarters regimes that have been abolished may convert to the IBC regime, which offers incentives including a reduced tax rate on certain income.

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If you have any questions about the content in *World Tax Advisor*, please email Sally Clurman at sclurman@deloitte.com.

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