

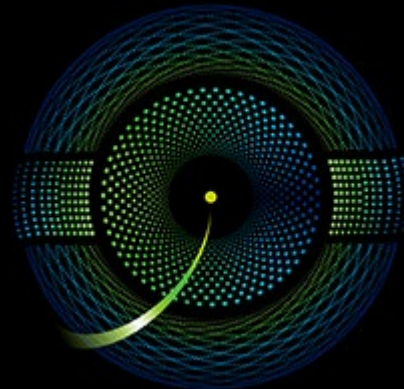
World Tax Advisor

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Highlights of key Czech Republic tax changes effective for 2024, including tax rate changes

A number of tax changes entered into force at the beginning of 2024, including an increase in the corporate income tax rate to 21%, changes to the VAT rates, and a change relating to the taxation of employee stock option plans. Legislation transposing into domestic law the EU “Pillar Two” directive also has entered into force.



Canada

RSU taxation in Canada: Clarifications from the Canada Revenue Agency

This article provides an overview of restricted stock unit taxation and the Canada Revenue Agency’s clarifications on issues including the circumstances under which a grant of full-value restricted stock units would be considered not to be in respect of services rendered by the employee prior to the grant date.

El Salvador

Importance of compliance with upcoming deadlines for transfer pricing obligations

This article discusses the formal obligations under the transfer pricing regime and the relevant deadlines in 2024, as well as the main areas of taxpayer noncompliance. Certain penalties for noncompliance are imposed based on the taxpayer’s equity or

shareholders' equity and potentially may be onerous.



India

Guidelines for TDS on payment by e-commerce operator issued

The Central Board of Direct Taxes has issued guidance regarding the applicability of “tax deduction at source” provisions to payments or deemed payments made by an e-commerce operator to an e-commerce participant. The guidance includes clarification around situations where there are multiple e-commerce operators involved in a transaction.



Malaysia

Capital gains tax in Malaysia: What do we know thus far?

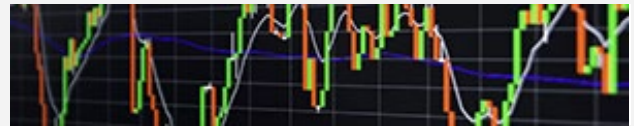
Legislation has been published that introduces a tax on gains or profits from the disposal of certain capital assets on or after 1 January 2024. Deloitte Malaysia has developed a set of frequently asked questions, along with commentary, which aim to provide readers with an overview of the new capital gains tax regime.



OECD

Comments published on model treaty proposals regarding extractible natural resources

The OECD has published responses to its invitation for public comments on a public consultation document on proposed changes to the commentary to the OECD model tax treaty with respect to article 5—dealing with the definition of a permanent establishment—and its application in relation to extractible natural resources.



Spain

Highlights of draft legislation to implement global minimum tax

This article discusses draft legislation to establish a “complementary tax” to ensure a global minimum level of taxation for multinational groups and large domestic groups, which is broadly in line with the EU Pillar Two directive, as well as with the OECD Pillar Two model rules. The law generally is expected to be effective for tax periods beginning on or after 31 December 2023.



Sweden

Period of tax relief for foreign experts extended

The parliament has approved the Ministry of Finance's proposal to extend the period of tax relief from five to seven years for foreign experts, researchers, and other key personnel who are in Sweden on limited stays. The maximum duration of an intended stay in Sweden also has been increased from five to seven years.



United Kingdom

Tax authorities publish transfer pricing and diverted profit tax statistics for 2022-23

The tax authorities have published an annual update on transfer pricing and diverted profits tax statistics. The update includes information on the transfer pricing yield and transfer pricing cases settled, as well as on the net amount received and estimated additional tax arising from investigations into diverted profits.

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