

# International Tax Review

Latest information on  
international tax  
developments provided by  
EY Austria

## International Tax Developments

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### Austria: EY Tax Short Cuts - English No. 11/2025 of 22 May 2025

- Government Bills: Budget Restructuring Measures Act 2025 (II), Budget Accompanying Act 2025
- Income Tax Guidelines - Maintenance Decree 2025
- MoF: Tax recognition of "split profit distributions in the narrower sense"
- MoF: List of countries for automatic exchange of financial account information published
- Stamp Duties Guidelines - Maintenance Decree 2025
- MoF: VAT qualification of reimbursement of educational costs | [Read more](#)

### Austria: EY Tax Short Cuts - English No. 12/2025 of 5 June 2025

- Freedom of Information Amendment Act MoF - Ministerial Draft
- Budget Restructuring Measures Act 2025 Part II published in the Federal Law Gazette
- ECJ rejects Federal Fiscal Court referral on the state aid nature of the VAT exemption for intermediary bank services as inadmissible
- VAT Refund for Non-EU businesses until 30 June 2025
- ECJ on the VAT treatment of lump-sum loss compensation payments | [Read more](#)



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# EU Developments

## *EU Developments*

- European Parliament approves simplifications to CBAM procedures suggested by European Commission | [Read more](#)
- EU reaches provisional agreement for gradual deployment of the EES | [Read more](#)
- European Court of Justice rules on customs valuation treatment of post-entry price adjustments | [Read more](#)
- Switzerland successfully negotiates a safeguard clause as part of the Bilateral III negotiations with the EU | [Read more](#)

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## Algeria

### *Country Updates*

- Algeria clarifies adjustments to capital gains derived from transfer of shares, equity interests and similar securities | [Read more](#)
- Algerian order introduces new categories of fixed assets and their depreciation periods | [Read more](#)

## Argentina

- Argentina enacts new regulations impacting foreign nationals and employers | [Read more](#)
- Argentina issues measures to further deregulate | [Read more](#)
- Argentina enacts Multilateral Instrument law | [Read more](#)
- Argentina implements installment plan for corporate income tax obligations | [Read more](#)

## Australia

- Australian Tax Office releases draft guideline on determining 'debt quantum' in context of thin-capitalization rules | [Read more](#)
- Australian Tax Office updates Pillar Two website | [Read more](#)

## Brazil

- Brazilian Government introduces changes to regulations dealing with taxation of financial operations | [Read more](#)

## Bermuda

- Bermuda releases final CIT administrative regulations | [Read more](#)

## Canada

- Canada Border Services Agency updates customs notice for surtax remission | [Read more](#)
- Canada's DST may trigger proposed US IRC Section 899 | [Read more](#)

## Country Updates

- Ontario budget 2025-26 | [Read more](#)
- Preparing for digital services tax filing and payment obligations | [Read more](#)

## Costa Rica

- Costa Rica introduces changes to company registration regulations | [Read more](#)
- New virtual tax administration platform to launch in August 2025 | [Read more](#)

## Dominican Republic

- Dominican Tax Authority extends deadline for implementing Electronic Invoicing for Large Local and Medium Taxpayers | [Read more](#)

## Hong Kong

- Hong Kong enacts law on BEPS 2.0 Pillar Two | [Read more](#)
- Hong Kong enacts law for inward company re-domiciliation | [Read more](#)

## Kenya

- Kenya Tax Appeals Tribunal offers a distinction between reimbursements and incidental costs for VAT purposes | [Read more](#)
- Kenya accepting applications for the new Digital Nomad Permit | [Read more](#)
- Kenya introduces Finance Bill 2025 | [Read more](#)

## New Zealand

- New Zealand 2025 Budget introduces significant tax reforms | [Read more](#)
- New Zealand Government drops Digital Services Tax proposals | [Read more](#)

## Nigeria

- Nigeria enacts cost efficiency tax incentives for oil and gas upstream petroleum sector | [Read more](#)
- Nigeria's Non-Resident Persons' Tax Office ramps up tax compliance enforcement for nonresidents with Nigerian business presence | [Read more](#)
- Nigeria's Federal Inland Revenue Service rolls out e-Invoicing platform | [Read more](#)

## Peru

- Peruvian Executive Branch ratifies OECD Multilateral Convention | [Read more](#)

## Country Updates

### Poland

- Poland releases draft logical structure for e-invoices | [Read more](#)

### Saudi Arabia

- Saudi Arabia issues Real Estate Transaction Tax Implementing Regulations | [Read more](#)

### Slovenia

- Slovenia amends regulations impacting third-country nationals and employers | [Read more](#)

### Switzerland

- Switzerland successfully negotiates a safeguard clause as part of the Bilateral III negotiations with the EU | [Read more](#)

### Thailand

- Thailand's BOI-promoted companies subject to the TM.30 notification requirement | [Read more](#)

### Türkiye

- Türkiye extends application of 0% withholding tax on income/gains from government bonds, treasury bonds and certain lease certificates | [Read more](#)

### United Kingdom

- UK announces new single tax on securities to replace stamp duty and stamp duty reserve tax | [Read more](#)

### United States

- IRS reissues interim guidance on Advance Pricing Agreement submissions | [Read more](#)
- US increases import tariffs of aluminum and steel | [Read more](#)
- USTR extends certain exclusions from China Section 301 tariffs | [Read more](#)
- Proposed IRC Section 899 would affect certain asset management entities | [Read more](#)
- Court of International Trade rules tariffs under International Emergency Economic Powers Act unlawful; appeals court temporarily reinstates tariffs as case proceeds | [Read more](#)

## Country Updates

- US House approves tax reconciliation bill, with minor rate changes in international tax provisions | [Read more](#)
- New IRC Section 899 would increase tax rates and expand BEAT for certain inbound taxpayers | [Read more](#)
- US House Ways and Means Committee approves tax reconciliation bill, including several international tax provisions | [Read more](#)

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