



## Newsletter 1 – October / November 2019

In this Newsletter we would like to keep you up to date on relevant Transfer Pricing developments in an accessible manner.

We are pleased to keep you informed about the most important national and global developments in tax law that are (closely) related to the transfer pricing world.

Please feel free to contact us if you have any questions.

You may send an e-mail to [marketing@quanterglobal.com](mailto:marketing@quanterglobal.com) or call us at +31 88 221 5800 and we will introduce you to the relevant professional.

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### Developments and blogs:

- Finance: setting up an intercompany loan instead of testing ([read our blog](#)).
  - Tax Intelligence: big data may trigger tax audits without a good understanding of the company and its intercompany transactions ([read our blog](#)).
  - Digital Economy: OECD publishes a proposal to tax profits in countries where customers are located ([read our blog](#)).
  - European Union: United Arab Emirates and Marshall Islands removed from EU list of non-cooperative jurisdictions.
  - State Aid: European Commission loses Starbucks case and wins Fiat case.
  - CbCr: Members of the European Parliament push to make Country-by-Country reporting publicly available.
  - CbCr: OECD publishes an updated guidance on Country-by-Country reporting for tax administrations and MNE Groups.
  - Exchange of information: OECD releases guidance on spontaneous exchange of relevant information for no or only nominal tax jurisdictions.
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## News around the world:

- Argentina: Argentina issues proposed transfer pricing guidance with significant changes to transfer pricing requirements.
- Denmark: Denmark's Ministry of Taxation issued a draft bill including a requirement to submit Transfer Pricing documentation together with the corporate income tax return.
- Germany: Germany refuses to support EU proposal consisting of forcing large companies to publicly report how much tax they pay on a country-by-country basis; EU proposal stalls again.
- Ireland: On 17 October 2019, Ireland's Finance Bill 2019 was published. This contains (among others) measures affecting transfer pricing rules, documentation obligations and anti-hybrid provisions, which are mostly a result of international tax initiatives such as BEPS and ATAD.
- Italy: The Italian tax authorities have issued clarifications for taxpayers who want to report eligible income for the patent box regime on their tax return instead of applying for a tax ruling.
- Jordan: Jordan joins the Inclusive Framework on BEPS and the Global Forum on Tax Transparency.
- Mauritius: On 18 October 2019, the Mauritian Government deposited its instrument of ratification of the MLI with the OECD.
- Netherlands: New draft legislation for 2021 on withholding tax to prevent the Netherlands to be used as a gateway to low-tax jurisdictions. Changes are also made to the list of countries with a low tax rate.
- Paraguay: New transfer pricing rules including transfer pricing documentation requirements are introduced in Paraguay.
- Turkey: On 24 October Turkey has published a draft law on Digital Services Tax, with the main objective of meeting the challenges of taxing the digital economy.

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### Quanterra Global Academy: 20 November: Introduction to the basics of Transfer Pricing

On 16 October Quanterra Global proudly announced the start of the 'Quanterra Global Academy'.

- The Academy is meant to share Transfer Pricing knowledge and to introduce participants to Quanterra Global in an accessible manner.
- The Academy is intended for in-house tax and finance professionals who would like to learn about Transfer Pricing.
- More information available at our [website](#).



This information is intended only as a general update for interested persons and should not be used as a basis for decision-making. For further details please contact Quanterra Global, Eindhovenseweg 128, 5582 HW Waalre, the Netherlands, phone: +31 88 221 58 00, e-mail: [marketing@quanterraglobal.com](mailto:marketing@quanterraglobal.com)

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