



## Newsletter – December 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:

- TP documentation: 4 steps to manage the compliance burden efficiently and mitigate risks ([click here for our blog](#)).
  - CbCr: OECD publishes a list of common errors made by MNEs in preparing their Country-by-Country reports.
  - Digital Economy: OECD publishes pillar two of the Digital Economy papers, which includes a proposal to ensure that multinationals are globally subject to a minimum effective tax rate.
  - State Aid: European Commission opens an in-depth investigation into possible state aid for Italian harbours.
  - Tax dispute resolutions: OECD requests public consultation on effectiveness of cross- border tax dispute resolution processes of 13 countries (deadline 16 December 2019).
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## News around the world:

- Colombia: Issues new guidance on the taxation of permanent establishments (PEs) and branches.
  - Czech Republic: Proposal to impose 7% digital services tax on large tech companies.
  - Denmark: High Court ruled in favour of the Danish tax authorities that a Danish staffing company was not allowed to deduct royalties paid to its Swiss parent.
  - The Netherlands: The Dutch tax authorities started publishing summaries of advance pricing agreements (APAs).
  - Tunisia: Multilateral CbCr agreement signed by Tunisia.
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## Quantera Global Academy:

- On 20 November 2019 Quantera Global successfully started with a fully booked first edition of the 'Quantera Global Academy' – Transfer Pricing basics. Information about the next 'Quantera Global Academy' will follow soon.
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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 Quantera Global, Eindhovenseweg 128, 5582 HW Waalre, the Netherlands, phone: +31 88 221 58 00, e-mail: [marketing@quanteraglobal.com](mailto:marketing@quanteraglobal.com)

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