

Americas Tax Roundup

Latest news – Americas

Tax information at your fingertips

Global Tax Guides app

Access tax technical data on 150+ jurisdictions from your iPad® anywhere in the world. Download the guides here.

Brazil increases tax on financial transactions

The Brazilian Government published Decree 10,797/21, increasing the financial transactions tax (IOF) on domestic loans from 20 September 2021 to 31 December 2021. Under the decree, the new IOF credit rates for entities apply to domestic loans with pre-determined principal amounts at a maximum rate of 2.42% per year (0.38% upon grant, plus 0.00559% per day on the principal, limited to 2.04%, bringing the total to 2.42%).

EY's 'Latest on BEPS and Beyond' for September 2021

EY's Latest on BEPS and Beyond monthly newsletter reviews global and regional BEPS-related policy trends, as well as recent BEPS-driven developments in individual countries. The September 2021 edition highlights (1) Barbados's joining the agreement on BEPS 2.0, and (2) the proposals to change US international tax rules.

This week's tax treaty news in the Americas

- Belize and United Arab Emirates: income and capital tax treaty entered into force
- Brazil and Austria: signing of a social security agreement authorized by the Austrian Council of Ministers
- Canada and Andorra: negotiations for a tax treaty announced
- Paraguay and United Arab Emirates: income tax treaty entered into force

Upcoming webcasts

BEPS 2.0: Beyond 2021 (28 October)

In this webcast, panelists discuss BEPS 2.0 and taxation of the digitalized economy updates after the October OECD/G20 Inclusive Framework and the G20 Finance Ministers and Central Bank Governors meetings.

Recently archived webcasts

US international tax reform: Update on recent developments

Significant US international tax changes have been proposed this year, including the Biden Administration's Made in America Plan (as outlined in the Green Book) and a discussion draft of Senator Ron Wyden's international tax framework, among others. Many of these changes would significantly affect the global taxation of multinational corporate groups. On this webcast, our panelists discussed the various proposals.



Recently issued EY podcasts

US Cross-Border Taxation weekly podcast, 24 September 2021

EY's weekly US Cross-border Taxation podcast reviews the week's US international tax-related developments. Highlights this week include:

- White House, House and Senate Democrats discussing path forward on budget reconciliation bill
- IRS APMA director warns taxpayers against unilateral relief

You can register for this weekly podcast on iTunes here.

This week's EY Global Tax Alerts

Americas Tax Alerts

- Report on recent US international tax developments 24 September 2021
- Brazil increases tax on financial transactions
- Colombia enacts 2021 tax reform

Other Cross-border Alerts

- Israeli Court rules on reclassification of trademark transaction between a shareholder and its company and the arm's-length return on R&D services
- Norwegian Government proposes amendments to tax rules applicable to cross-border restructurings
- The Netherlands publishes draft legislation on reverse hybrid entities as final part of ATAD II implementation
- Israeli Tax Authority finalizes international tax reform package for further discussion and potential legislation
- Cyprus announces further extension of non-application of administrative fines for DAC6 submissions to 30 November 2021
- ► The Netherlands publishes 2022 budget proposals
- High Court of Kenya declares that minimum tax is unconstitutional

Transfer Pricing Alerts

- Netherlands issues proposed legislation with unilateral measures against international transfer pricing mismatches
- Singapore expands transfer pricing guidance

OECD Alerts

Latest on BEPS and Beyond - September 2021



Human Capital Alerts

- Costa Rica: Digital nomad visas
- UK announces new entry rules for international travelers
- China implements new, stricter requirements for obtaining health codes in 55 jurisdictions
- Sweden implements new, stricter requirements for obtaining permanent residence

Indirect Tax Alerts

- Poland: VAT aspects of proposed tax reform
- Italy: New VAT rules on e-invoicing of cross-border transactions and pre-populated VAT ledgers and returns
- Swiss Parliament acts to eliminate import customs duties on industrial goods as soon as 1 January 2022

EY Industry and Tax Services publications

Industries

Automotive

Podcast: How the pandemic triggered a shift toward sustainability

Health & Life Sciences

How to account for outcome-based payment arrangements in life sciences

Services

Tax

- Why pandemic-induced trade protectionism will affect tax for years
- How multi-hub models can enhance operations and reduce tax risk

Issues

Risk

- ► How to survive and revive amid commercial aerospace supplier distress
- COVID-19: Three ways boards can help create systemic change

Comments

If you have any questions or suggestions about this newsletter, please email Global Tax News Update Help at: globaltaxnewsupdatehelp@ey.com.



EY | Building a better working world

About EY

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets. Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate. Working across assurance, consulting, law, strategy, tax and transactions, EY teams ask better questions to find new answers for the complex issues facing our world today.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. Information about how EY collects and uses personal data and a description of the rights individuals have under data protection legislation are available via ey.com/privacy. EY member firms do not practice law where prohibited by local laws. For more information about our organization, please visit www.ey.com.

Ernst & Young LLP is a client-serving member firm of Ernst & Young Global Limited operating in the US.

Important Commercial Notice: This email may constitute an advertisement or solicitation under US law, if its primary purpose is to advertise or promote the products or services of Ernst & Young LLP or any of its client-serving affiliates. Our principal postal address is 5 Times Square, New York, NY 10036.

Use the link below to opt-out if you would prefer not to receive any advertising or promotional email from Ernst & Young LLP or any of its affiliates (except for Ernst & Young Online and the ey.com website, which track email preferences through a separate process). Your email address will be immediately removed from our central mailing list for newsletters and alerts, and all emails from Ernst & Young LLP and its affiliates designated as advertising or promotional will be automatically blocked as soon as necessary modifications to our email system are completed.

Remove me from all EY commercial emails.