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Americas Tax Roundup

Latest news – Americas

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[Colombian Congress approves tax reform bill](#)

On 17 November 2022, the Colombian Congress approved the tax reform bill submitted by the Colombian Government. The tax reform bill establishes a 15% minimum tax rate (referred to as adjusted tax rate). It also increases taxes on nonresident entities.

[Ecuador enacts new regulations on Income Tax, including lower income tax rates for new investments](#)

Through a Presidential Decree enacted on 10 November 2022, a reform to Law regulations determines how to apply the lower income tax rates as a benefit for new investments and companies signing an Investment Agreement with the Ecuadorian Government. There are also new conditions for asset depreciation and the deductibility limit for income tax purposes on royalties, technical services, as well as administrative and advisory services with related parties.

[US Treasury releases latest proposed regulations on foreign tax credit](#)

The US Treasury Department released proposed regulations ([REG-112096-22](#)) on foreign tax credits. The proposed regulations would amend the final foreign tax credit regulations published on 4 January 2022 ([TD 9959](#), as amended by [technical corrections](#) to those regulations published on 27 July 2022). Among other things, the proposed regulations would significantly relax the cost recovery requirement by providing that a foreign tax law need only allow for recovery of "substantially all" of each item of significant cost or expense, regardless of what the principles underlying any disallowances are.

This week's tax treaty news in the Americas

- ▶ Canada and Tunisia: social security agreement signed
- ▶ Ecuador and Korea (Rep.): eighth round of negotiations for strategic economic cooperation agreement held
- ▶ Peru and Hong Kong: negotiations for a free trade agreement launched
- ▶ United States and Croatia: signing of income tax treaty authorized by Croatia



Upcoming webcasts

[How a changing M&A and geopolitical landscape will impact tax strategies \(29 November\)](#)

Based on the current market environment, it is key that businesses consider their M&A strategy. In this webcast, panelists will discuss updates on the global M&A market.

[New proposed foreign tax credit regulations: what changed, what didn't, and what could it all mean for your company? \(1 December\)](#)

Join us for an update on the newly released proposed foreign tax credit regulations. The proposed regulations make several changes to address issues identified in the December 2021 final foreign tax credit regulations. Those final foreign tax credit regulations significantly changed the rules on determining what is a creditable foreign income tax; some of these changes had the potential to render many long-standing creditable taxes noncreditable.

[How to navigate information requests in transfer pricing audits \(6 December\)](#)

This webcast will address various cross-border controversy topics and feature insights from EY professionals around the globe.

[Global treasury: Key tax trends and topics to consider for 2023 \(8 December\)](#)

A global EY panel will discuss key tax trends and topics that will affect global treasury activity in 2023. This session will cover, in particular, multinationals' cash management and risk management activities, as well as the potential effect of OECD BEPS 2.0 Pillar Two and the trends in financial transaction transfer pricing controversy.

[Omnishoring: Recent trends in supply chain, tax and global trade \(13 December\)](#)

A global EY panel will discuss the current factors that affect supply chain. This session will cover the macroeconomic, geopolitical and operational trends driving multinationals to reconsider the resilience of their supply chain across the manufacturing, logistics, distribution and sales functions.

[Tax in the time of COVID-19: update on legislative, economic, regulatory and IRS developments \(16 December\)](#)

COVID-19 and the resulting economic crisis have made reacting to tax developments more complicated than ever. Join us for the next webcast in our series as we discuss how businesses can navigate the tax policy environment and continue to effectively operate their tax function in this time of crisis and change. Panelists will provide updates on: (i) the US economy and tax policy; (ii) breaking developments; and (iii) what's happening at the IRS.

For a full list of upcoming webcasts, please access EY's webcast page on ey.com [here](#).

Recently issued EY podcasts

[US Cross-Border Taxation weekly podcast, 23 November 2022](#)

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

- ▶ IRS pivoting to cryptocurrency, opens digital asset project office
- ▶ IRS drafting questions on cryptocurrency, digital assets for corporate and partnership returns

You can register for this weekly podcast on Apple Podcasts [here](#).



This week's EY Global Tax Alerts

Americas Global Tax Alerts

- ▶ [Report on recent US international tax developments - 23 November 2022](#)
- ▶ [Colombian Congress approves tax reform bill](#)
- ▶ [Ecuador enacts new regulations on Income Tax, including lower income tax rates for new investments](#)

Human Capital Alerts

- ▶ [Malaysia's new ePASS to be issued upon renewal of Employment and Dependant's Passes](#)
- ▶ [Switzerland's new quotas for Croatian nationals go into effect on 1 January 2023](#)
- ▶ [UK | Immigration takeaways from the Prime Minister's speech on 21 November 2022](#)

Other Global Tax Alerts

- ▶ [Hong Kong introduces bill to refine its foreign source income exemption regime](#)

EY Industry and Tax Services publications

Industry

Consumer Products & Retail

- ▶ [Redesign consumer company ecosystems to scale sustainability](#)

Services

People and workforce

- ▶ [Updated: How COVID-19 is disrupting immigration policies and worker mobility: a tracker](#)

Comments

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



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