



EU Tax Perspectives

Ariel Manika
Director, KPMG in Greece

Raluca Enache
Associate Partner, KPMG's EU Tax Centre



A selection of EU hot topics



EU BEPS 2.0

The EU Minimum Tax Directive



BEFIT

Business in Europe: Framework for Income Taxation – the new EU common corporate tax base



SAFE

Securing the Activity Framework of Enablers – new obligations for tax intermediaries



Upcoming developments

A few topics to keep an eye on

EU Withholding Tax Relief Framework (FASTER)

- Proposal initially expected before end of 2022, but likely detailed to Spring/ Summer 2023

Reporting requirement for platform operators: DAC7

- Applies from January 1, 2023

Automatic exchange of information for crypto-currencies: DAC8

- Proposal scheduled for November 2022, but may be delayed
- Possible harmonization of penalties under DAC?
- Exchange of tax rulings for individuals?

Tax Transparency

- Proposal to publish effective tax rates (**ETR**) delayed
- **Public CbyC Reporting** – early adopters

EU Mandatory Disclosure Rules: DAC6

- EC to release report in early 2023
- Possible changes to the Directive?

Windfall profits taxes

- To be notified to the EU before end of 2022
- Impact on banks?



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