



# Taxation of the digitalized economy

**Developments summary**

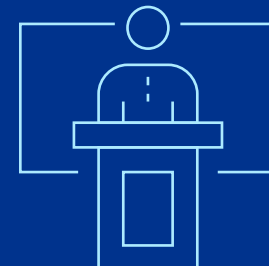
Updated: November 13, 2025

[kpmg.com/us](https://kpmg.com/us)

# Notices

The following information is not intended to be “written advice concerning one or more Federal tax matters” subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230.

The information contained herein is of a general nature and based on authorities that are subject to change. Applicability of the information to specific situations should be determined through consultation with your tax adviser.



# Contents

|   |     |
|---|-----|
| Contents  | 3   |
| Direct taxes  | 11  |
| Summary chart of certain enacted or proposed direct taxes               | 12  |
| Country specific detail – Direct taxes                                  | 28  |
| OECD Milestones – Direct taxes  | 93  |
| EU Milestones – Direct taxes  | 96  |
| Indirect taxes  | 98  |
| Country specific detail – Indirect taxes                                | 99  |
| OECD Milestones – Indirect taxes  | 191 |
| EU Milestones – Indirect taxes  | 192 |
| Country specific detail – Platform reporting / withholding requirements | 197 |

# Taxation of the digitalized economy

**Latest developments**

## Summary chart of latest direct and indirect tax measures

| <span>✓</span> <i>Enacted</i> <span>●</span> <i>Proposed/Announced</i> <span>✗</span> <i>Proposal rejected/Waiting for Global Solution</i> |        |         |                    |   |
|--|--------|---------|--------------------|---|
| Country  | Status |         | Tax Type           | Update  |
| Bhutan   | ✓      | Enacted | VAT                | Bhutan recently confirmed that it will implement a GST regime from January 1, 2026, replacing its sales tax. The GST Amendment Law 2025 sets a five percent standard rate and mandates registration for non-resident providers of imported B2C services above specified thresholds. Electronic services and platforms are covered, with strict invoicing, penalties, and enforcement provisions.  |
| Chile  | ✓      | Enacted | VAT                | On October 16, 2025, Chile's tax authority (SII) published Ruling No. 2066-2025, clarifying the VAT treatment of offshore software licensing services. The ruling confirms that such services provided to Chilean entities are subject to VAT under the general rules, regardless of whether the foreign seller contracts directly or through a Chilean intermediary. When the Chilean recipient is a VAT taxpayer, the reverse charge mechanism applies, requiring the local entity to issue a purchase invoice, file the VAT return, and remit the tax directly to the authorities. The foreign seller is thereby relieved of VAT collection obligations.   |
| Chile  | ✓      | Enacted | VAT                | Chile's tax authority (SII) recently implemented a series of VAT-related measures affecting the sale of low-value goods into Chile. Under Joint Resolution Ex. SII No. 141-2025 and SNA No. 4260-2025 (dated October 15, 2025), Chilean platform operators must submit shipment-level data to validate VAT exemptions, including tax ID, confirmation of VAT charge, and tracking identifiers. Resolution Ex. SII No. 142-2025 (dated October 16, 2025) removed the exclusion of goods subject to special import taxes from the simplified VAT regime, allowing broader eligibility for goods valued under USD 500. Finally, Resolution Ex. SII No. 145-2025 (dated October 16, 2025) introduced new filing rules requiring domestic platforms to charge 19 percent VAT to Chilean consumers (not VAT taxpayers) purchasing low-value goods from foreign sellers via these platforms. |
| Colombia   | ✓      | Enacted | Platform Reporting | On September 30, 2025, Colombia's tax authority (DIAN) issued Resolution 228 amending reporting obligations for digital platform operators. It clarifies scope for nonresident operators facilitating taxable activities, expands "relevant activities" definitions, and  |

|                       |   |           |                    |  |
|-----------------------|---|-----------|--------------------|--|
|                       |   |           |                    | introduces due diligence standards. Reporting must include financial account identifiers when available, applying to the October–December 2025 reporting period.   |
| <b>Colombia</b>       | ✓ | Enacted   | VAT                | On October 14, 2025, Colombia's Constitutional Court published Decision No. C-431, validating the emergency tax measures introduced under Executive Decree No. 175-2025 during the state of internal unrest. The decree imposes temporary taxes, including VAT on online gambling. The Court upheld the constitutionality of these measures, provided that the revenue is exclusively allocated to specific public sector budget items such as health, education, and defense. If collections exceed the authorized budgetary needs, taxpayers may request refunds or offsets within five years. |
| <b>Denmark</b>        | ✓ | Enacted   | Platform Reporting | On October 2, 2025, Denmark published Executive Order No. 1155, establishing reporting obligations for crypto asset service providers under its implementation of the EU's DAC8 directive. Effective January 1, 2026, the order requires providers operating in Denmark to collect and report customer and transaction data, verify tax residency, and notify authorities of non-compliance. These obligations apply to both individuals and entities facilitating crypto asset exchanges or transfers for users in Denmark.   |
| <b>Denmark</b>        | ✓ | Enacted   | Platform Reporting | On October 2, 2025, Denmark published Executive Order No. 1159 amending the DAC7 reporting obligations for digital platform operators. Effective January 1, 2026, the order introduces a new "Identification Service," allowing platform operators to verify sellers' identity and tax residence electronically. When using this service, operators must report only the seller's name, identification reference, and issuing Member State. Additionally, the Danish Tax Agency may now register or deregister platform operators in the EU's central register.                                  |
| <b>European Union</b> | ✓ | Enacted   | VAT                | On October 9, 2025, the CJEU ruled in <i>Xyrality</i> (Case C101/24) that electronic marketplaces can qualify as undisclosed agents under Article 28 of the EU VAT Directive, even before 2015 amendments. This creates two separate transactions: (1) a sale from the developer to the platform and (2) a sale from the platform to the customer.   |
| <b>European Union</b> | ● | Announced | DST                | On October 16, 2025, the European Parliament's Subcommittee on Tax Matters held an interparliamentary meeting to discuss the taxation of digital activities at national and international levels. The session focused on the potential implementation of a digital services tax (DST), its technical parameters, and the challenges of taxing digital companies. Speakers from the European  |



|                    |   |          |                    |   |
|--------------------|---|----------|--------------------|---|
|                    |   |          |                    | Commission and several Member States emphasized the need for a multilateral solution, highlighting the OECD's Pillar One framework as the preferred approach. While DST is viewed as a possible interim measure, concerns over double taxation persist. The meeting also addressed administrative and economic implications of DST across jurisdictions.  |
| <b>Finland</b>     | ● | Proposed | Platform Reporting | On October 9, 2025, the Finnish parliament accepted for consideration Bill No. HE 140/2025, which proposes amendments to DAC7 and DAC8 reporting obligations for digital platform operators. The bill would require operators to conduct due diligence and report sales and rental activities involving sellers in jurisdictions participating in the Multilateral Competent Authority Agreement on Automatic Exchange of Information on Income Derived Through Digital Platforms (DPI MCAA). It mandates information exchanges within four months after each reporting period and sets January 31, 2027, as the first reporting deadline for non-EU countries, with exchanges commencing by April 30, 2027. If enacted, the law will take effect on January 1, 2026. |
| <b>France</b>      | ● | Proposed | DST                | On November 24, 2025, the National Assembly voted against the 2026 Finance Bill. However, the DST-related amendments may be proposed again in the Senate.   |
| <b>Greece</b>      | ✓ | Enacted  | Platform reporting | On September 11, 2025, Greece signed the DPI MCAA, joining 31 other jurisdictions. The agreement, based on OECD Model Rules, enables automatic exchange of data collected by digital platform operators regarding income earned by sellers in the sharing and gig economy and through online sales. The DPI MCAA aims to strengthen transparency and compliance across jurisdictions through coordinated reporting.   |
| <b>Iceland</b>     | ● | Proposed | Streaming tax      | On October 9, 2025, Iceland proposed introducing a five percent cultural contribution tax on revenues earned by streaming services offering video-on-demand (VOD) in Iceland effective January 1, 2026. The tax would decrease to zero percent if the streaming service directly invests at least five percent of that revenue in new Icelandic content. The proposal exempts public service media, small services (under ISK 20 million in annual revenue or under one percent of Icelandic households), and services that only carry sports, news, or religious content.  |
| <b>Netherlands</b> | ● | Proposed | VAT                | On October 3, 2025, the Dutch Ministry of Finance launched a public consultation on draft legislation introducing new VAT obligations for digital platforms facilitating short-term accommodation rentals and road passenger transport in line with   |

|                      |   |           |            |   |
|----------------------|---|-----------|------------|---|
|                      |   |           |            | the VAT in the Digital Age package. Effective from July 1, 2028, the proposed rules would require platforms to collect and remit VAT on services offered through their systems and maintain records verifying the VAT status of service providers. Platforms would become liable for VAT unless providers can demonstrate compliance or exemption under the Dutch small business rules.   |
| <b>Russia</b>        | ● | Proposed  | VAT        | On October 2, 2025, Russia's Ministry of Finance published draft amendments to the Tax Code proposing VAT rules for imported e-commerce goods purchased by individuals through online platforms. If the value of goods is below the Eurasian Economic Union's customs duty-free threshold, VAT would be collected by the foreign or Russian platform acting as a tax agent and remitted monthly. For goods exceeding the threshold, buyers must pay VAT before registering the customs declaration. The VAT rate would be phased in as follows: five percent in 2027, 10 percent in 2028, 15 percent in 2029, and 20 percent from 2030. |
| <b>Türkiye</b>       | ● | Proposed  | DST        | On October 30, 2025, a draft bill was submitted to Türkiye's Grand National Assembly proposing an increase in the digital services tax rate for foreign digital service providers from 7.5 percent to 12.5 percent. The standard rate of 7.5 percent would continue to apply to domestic providers.   |
| <b>United States</b> | ● | Announced | DST        | On October 26, 2025, the United States announced preliminary trade agreements with Cambodia, Malaysia, and Thailand that include provisions preventing the imposition of digital services taxes that would discriminate against U.S. companies.   |
| <b>Uruguay</b>       | ✓ | Enacted   | VAT        | On October 1, 2025, Uruguay's General Directorate of Taxation published Consultation No. 6679, clarifying the VAT treatment of a subscription service offered by a Swiss entity without a permanent establishment in Uruguay. The service, which includes audiovisual content such as recipes and tutorials, was deemed subject to VAT when consumed in Uruguay. Although the income qualifies as business profits taxable in Switzerland under the 2010 Uruguay-Switzerland tax treaty and is not subject to Uruguay's nonresident income tax (IRNR), Uruguayan VAT applies due to the nature of the digital content.                  |
| <b>Zambia</b>        | ✓ | Enacted   | Excise tax | On October 15, 2025, the Zambia Revenue Authority announced the implementation of a 10 percent excise tax on gaming and betting, applicable to amounts staked by players. The duty is payable by betting and gaming companies beginning with transactions from September 2025. Companies are required to manually compute and remit the excise duty using their   |



---

Withholding Tax accounts, selecting “Lumpsum Payment” as the payment type. Payments are due by the 15th of the month following the transaction period.

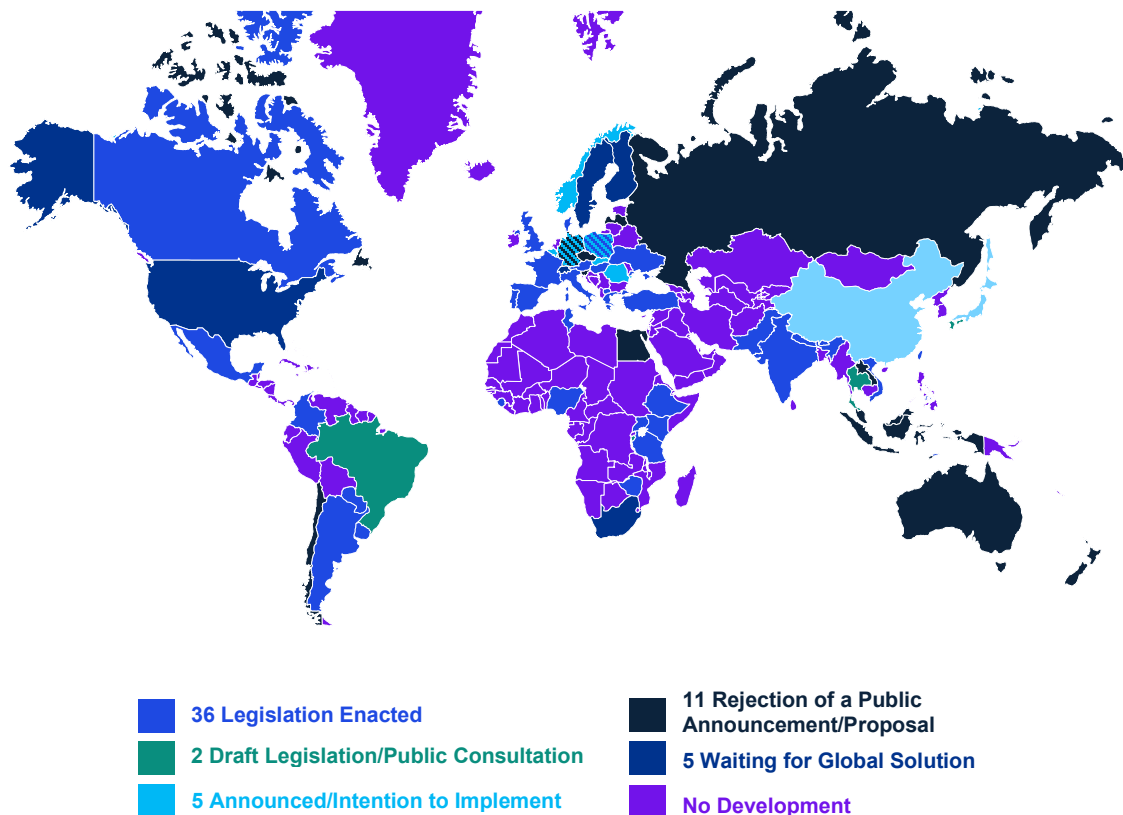
# Taxation of the digitalized economy

**Direct taxes**

# Direct taxes

Direct Taxes (e.g., DST/WHT/Digital PE)

- |                         |                       |
|-------------------------|-----------------------|
| 1. Argentina            | 30. New Zealand       |
| 2. Australia            | 31. Nigeria           |
| 3. Austria              | 32. Norway            |
| 4. Belgium (DST/PE)     | 33. Pakistan          |
| 5. Brazil               | 34. Paraguay          |
| 6. Canada               | 35. Poland (proposal) |
| 7. Chile                | 36. Portugal          |
| 8. China                | 37. Romania           |
| 9. Colombia             | 38. Russia            |
| 10. Costa Rica          | 39. Rwanda            |
| 11. Czech Republic      | 40. Sierra Leone      |
| 12. Denmark             | 41. Singapore         |
| 13. Ecuador             | 42. Slovakia (DST/PE) |
| 14. Egypt               | 43. Slovenia          |
| 15. Ethiopia            | 44. South Africa      |
| 16. Finland             | 45. Spain             |
| 17. France              | 46. Sweden            |
| 18. Germany (WHT) (DST) | 47. Switzerland       |
| 19. Greece              | 48. Taiwan            |
| 20. Hungary             | 49. Tanzania          |
| 21. India (Tax/WHT/PE)  | 50. Thailand          |
| 22. Indonesia           | 51. Tunisia           |
| 23. Israel (DST/PE)     | 52. Türkiye (WHT/DST) |
| 24. Italy               | 53. Ukraine (WHT)     |
| 25. Japan               | 54. United Kingdom    |
| 26. Kenya               | 55. United States     |
| 27. Laos                | 56. Uganda            |
| 28. Latvia              | 57. Uruguay           |
| 29. Malaysia            | 58. Vietnam           |
| 30. Mexico              | 59. Zimbabwe          |
| 31. Nepal               |                       |



To learn more about Taxation of the digitalized economy [BEPS Pillar One and Pillar Two \(kpmg.us\)](https://www.kpmg.us)

“The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of KPMG LLP concerning the legal status of any country, territory, city or any area or of its authorities or concerning the delineation of its frontiers or borders.”

## Summary chart of certain enacted or proposed direct taxes

| ✓ Enacted |             | ● Proposed/Intention   |               | ✗ Proposal rejected/Waiting for Global Solution |  |  |
|-----------|-------------|--|---------------|---|--|--|
| Country   | Status      | Effective date   | Type          | Rate  | Applicable tax base  |  |
| Argentina | ✓ Enacted   | December 15, 2020  | DST           | 5 percent - 10 percent - 15 percent             | Bets made through a digital platform in or from Argentina.   |  |
| Austria   | ✓ Enacted   | January 1, 2020  | DST           | 5 percent                                       | Revenues from advertising services on digital interfaces or any type of software or websites rendered in Austria                       |  |
| Belgium   | ● Announced | 2027 (anticipated)   | DST           | TBD   | TBD  |  |
| Brazil    | ● Proposed  | TBD  | DST           | 0.5 percent – 1 percent                         | Revenue from digital platforms, social networks, streaming services, online games, and other interactive digital content               |  |
|           | ● Proposed  | TBD  | DST           | 7 percent                                       | Gross revenue from digital advertising and data transactions involving user data   |  |
| Canada    | ✓ Enacted   | June 28, 2024, (on revenues earned as of January 1, 2022), collection halted as of June 29, 2025 | DST           | 3 percent                                       | Revenues from online business models including:<br>1. Online marketplaces<br>2. Social media<br>3. Online advertising<br>4. User data. |  |
|           | ✓ Enacted   | September 1, 2024  | Streaming tax | 5 percent                                       | Canadian revenues from online streaming services to support the Canadian broadcasting system.  |  |

# Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| ✓ Enacted  |           | ● Proposed/Intention |  | ✗ Proposal rejected/Waiting for Global Solution |   |  |
|------------|-----------|----------------------|--|---|---|--|
| Country    | Status    | Effective date       | Type   | Rate  | Applicable tax base   |  |
| Colombia   | ✓ Enacted | January 1, 2024      | SEP or alternatively DST                                     | 10 percent WHT or 3 percent DST                 | Services covered by the SEP:  |  |
|            |           |                      |  |   | <ol style="list-style-type: none"> <li>1. On-line advertising.</li> <li>2. Digital content (online/downloadable)</li> <li>3. Streaming (tv, music, videos, etc.)</li> <li>4. Any form of monetization of information and/or user data</li> <li>5. Intermediation platforms</li> <li>6. Digital subscriptions</li> <li>7. Data management (hosting, file exchange, etc.)</li> <li>8. Search engine licensing or services</li> <li>9. Provision of the right to use or exploit intangibles</li> <li>10. Any other service provided through a digital market</li> <li>11. Other digital / electronic services</li> </ol> |  |
| Costa Rica | ✓ Enacted | November 19, 2019    | General income tax on digital tourist rental services income | NA  | Income from provision of tourist rental services via digital platforms  |  |

# Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| <span>✓</span> <i>Enacted</i> <span>●</span> <i>Proposed/Intention</i> <span>✗</span> <i>Proposal rejected/Waiting for Global Solution</i> |                      |                 |  |   |   |  |
|--|----------------------|-----------------|--|---|---|--|
| Country  | Status               | Effective date  | Type   | Rate  | Applicable tax base   |  |
| Czech Republic   | ● Proposed (stalled) | TBD             | DST  | 7 percent but may be reduced to 5 percent                         | Receipts from the following sources: <ol style="list-style-type: none"> <li>targeted advertising on a digital interface;</li> <li>the transmission of data about users and generated from users' activities on digital interfaces; and</li> <li>the making available to users a multi-sided digital interface which may facilitate the provision of supplies of goods and services among users</li> </ol> |  |
| Denmark  | ✓ Enacted            | January 1, 2024 | Cultural contribution levy                     | 2 percent basic rate and potential additional 3 percent surcharge | The levy, based on the revenues generated in Denmark by on-demand audio-visual media service providers, is set at a basic rate of 2 percent for all on-demand streaming companies, with an additional 3 percent surcharge for companies that invest less than 5 percent of their Danish revenues in Danish content.   |  |
| Ecuador  | ✓ Enacted            | July 1, 2024    | Single income tax for sports betting operators | 15 percent  | The tax applies to all income, including commissions, received by resident and non-resident operators from sports betting activities in Ecuador, after deducting the total prizes paid out.   |  |
| Ethiopia   | ✓ Enacted            | July 8, 2026    | DST  | 5 percent   | Digital services  |  |



# Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| <div> <span>✓</span> <i>Enacted</i> <span>●</span> <i>Proposed/Intention</i> <span>✗</span> <i>Proposal rejected/Waiting for Global Solution</i> </div> |             |   |   |             |  |  |
|---|-------------|---|---|-------------|--|--|
| Country   | Status      | Effective date  | Type  | Rate        | Applicable tax base  |  |
| France  | ✓ Enacted   | 1/1/2019<br>but 2020 DST collection has been delayed to the end of 2020 | DST   | 3 percent   | <p>Portion of taxable services income related to France after application of the “French digital presence” ratios to the corresponding worldwide digital services receipts:</p> <ol style="list-style-type: none"> <li>The provision of a digital interface enabling users to enter into contacts and to interact with others (“intermediary services”).</li> <li>The provision of services to advertisers that aim at placing targeted advertising messages on a digital interface based on data collected about users and generated upon the consultation of such interface (“advertising services based on users’ data”)</li> </ol> |  |
|   | ✓ Enacted   | January 1, 2024   | Streaming tax   | 1.2 percent | The tax applies to both paid and free services providing access to recorded music and online music videos in France. It is due on amounts exceeding EUR 20 million.  |  |
| Germany   | ● Intention | TBD   | DST   | 10 percent  | Digital advertising  |  |
| Greece  | ✓ Enacted   | July 16, 2019   | General income tax on digital short-term rental services income | NA          | Income from short-term rentals in the sharing economy through digital platforms  |  |

# Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| ✓ Enacted |             | ● Proposed/Intention |                   | ✗ Proposal rejected/Waiting for Global Solution   |  |  |
|-----------|-------------|----------------------|-------------------|---|--|--|
| Country   | Status      | Effective date       | Type              | Rate  | Applicable tax base  |  |
| Hungary   | ✓ Enacted   | July 1, 2017         | DAT               | 7.5 percent, although the tax rate reduced to 0 percent, effective from July 1, 2019, through December 31, 2024 | Net turnover for the financial year generated by the broadcasting or publication of advertisements in Hungary  |  |
|           | ✓ Enacted   | April 1, 2022        | Digital PE        |   | Revenue related to the digital PE  |  |
| India     | ✓ Enacted   | October 1, 2020      | WHT               |   | Gross amount of sale of goods / provision of service facilitated through digital or electronic facility or platform  |  |
|           | ✗ Repealed  | April 1, 2025        | Equalisation Levy | 6 percent   | Gross receipt of online advertising payments made to overseas platforms, provision of digital advertising space or any other facility or service for the purpose of online advertisement. Only applicable to B2B transactions.   |  |
|           | ✗ Repealed  | August 1, 2024       | Equalisation Levy | 2 percent   | <ol style="list-style-type: none"> <li>Online sale of goods owned by the e-commerce operator</li> <li>Online provision of services provided by the e-commerce operator</li> <li>Online sale of goods or provision of services facilitated by the e-commerce operator (i.e., when the operator provides a platform for others to supply goods or provide services)</li> <li>Any combination of the above</li> </ol> |  |
|           | ✗ Repealed  | August 1, 2024       | Equalisation Levy | 2 percent   |  |  |
| Indonesia | ✓ Enacted   | March 31, 2020       | Digital PE        | NA  | Revenue related to the digital PE  |  |
| Israel    | ● Intention | TBD                  | DST               | 3 percent or 5 percent  | TBD - it should be modelled on the French DST  |  |
|           | ✓ Enacted   | April 12, 2016       | Digital PE        | NA  | Revenue related to the digital PE  |  |

| <span>✓</span> <i>Enacted</i> |           | <span>●</span> <i>Proposed/Intention</i> |                                      | <span>✗</span> <i>Proposal rejected/Waiting for Global Solution</i> |   |  |
|-------------------------------|-----------|--|--------------------------------------|---|---|--|
| Country                       | Status    | Effective date                           | Type                                 | Rate  | Applicable tax base   |  |
| Italy                         | ✓ Enacted | January 1, 2020                          | DST                                  | 3 percent   | Gross revenue derived from: <ol style="list-style-type: none"> <li>1. Advertising on a digital interface;</li> <li>2. A multilateral digital interface that allows users to buy/sell goods and services; and</li> <li>3. The transmission of user data generated from using a digital interface.</li> </ol> |  |
|                               |           |  |                                      |   | When a taxable service is supplied in Italy in a calendar year, the taxable revenue is the percentage of worldwide revenue from digital services that is represented by the services linked to Italy. The determination of the percentage varies based on the category of digital service                   |  |
| Kenya                         | ✓ Enacted | November 7, 2019                         | General income tax on digital income | NA  | Income accruing through a digital marketplace (i.e., a platform that enables the direct interaction between buyers and sellers of goods and services through electronic means) is chargeable to tax   |  |

x Repealed December 27, 2024 DST 1.5 percent

Gross revenue from:

1. Downloadable digital content including downloadable mobile applications, e-books and films;
2. Over-the-top services including streaming television shows, films, music, podcasts and any form of digital content;
3. Sale of, licensing of, or any other form of monetizing data collected about Kenyan users which has been generated from the users' activities on a digital marketplace;
4. Provision of a digital marketplace;
5. Subscription-based media including news, magazines and journals;
6. Electronic data management including website hosting, online data warehousing, file-sharing and cloud storage services;
7. Electronic booking or electronic ticketing services including the online sale of tickets;
8. Provision of search engine and automated held desk services including supply of customized search engine services;
9. Online distance training through pre-recorded media or e-learning including online courses and training; and
10. Any other service provided through a digital marketplace

| ✔ Enacted |           | ● Proposed/Intention |                                     | ✘ Proposal rejected/Waiting for Global Solution |   |
|-----------|-----------|----------------------|-------------------------------------|---|---|
| Country   | Status    | Effective date       | Type                                | Rate  | Applicable tax base   |
|           | ✔ Enacted | July 1, 2023         | WHT                                 | 15 percent                                      | The WHT would apply to:<br><div><div>1.</div><div>digital content creators that offer website and social media advertising, paid sponsorships, affiliate marketing, and subscriptions</div><div>2.</div><div>licensing fees that creators pay for music or photographs they use in their projects</div><div>3.</div><div>Crowdfunding for content creators or other individuals</div></div> |
|           | ✔ Enacted | December 27, 2024    | Significant Economic Presence (SEP) | 30 percent                                      | Taxable profit of non-resident persons whose income from the provision of services is derived from, or accrued in, Kenya through a business carried on through a digital marketplace. The taxable profit is deemed to be 10% of the gross turnover from taxable services.   |
| Malaysia  | ✔ Enacted | May 13, 2019         | WHT                                 | Variable  | Generally, income tax is imposed on the income of any person accruing in or derived from Malaysia.<br>Any income in relation to e-Commerce transactions is deemed to be derived from Malaysia if it is associated with any activities in Malaysia regardless of whether that income is received in Malaysia or otherwise.   |

# Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| ✓ Enacted   |                      | ● Proposed/Intention |            | ✗ Proposal rejected/Waiting for Global Solution |  |  |
|-------------|----------------------|----------------------|------------|---|--|--|
| Country     | Status               | Effective date       | Type       | Rate  | Applicable tax base  |  |
| Mexico      | ✓ Enacted            | June 1, 2020         | WHT        | Variable  | <p>Foreign digital service providers with no PE are not subject to income tax. However, intermediaries of digital services that process payments should withhold income tax for which Mexican individuals who sell goods and services on digital platforms are liable. The rate will depend on the activity performed.</p> <ol style="list-style-type: none"> <li>Ground transportation services of passengers and delivery of goods: 2.1 percent.</li> <li>Accommodation services: 4 percent.</li> <li>Sales of goods and services: 1 percent.</li> </ol> <p>When the individual resident in Mexico does not provide his TIN, the withholding tax will be 20 percent.</p> |  |
|             | ✓ Enacted            | July 17, 2022        | DST        | 2 percent                                       | Value of electronic services above NPR 2 million provided by non-resident  |  |
| Nepal       | ✓ Enacted            | July 16, 2024        | Digital PE | N/A   | Revenue related to the digital PE  |  |
| New Zealand | ✗ Proposal withdrawn | May20, 2025          | DST        | 3 percent                                       | Intermediation platforms, social media and content sharing platforms, internet search engines, digital advertising, and activities related to user-generated data.   |  |



## Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| <span>✓</span> <i>Enacted</i> |           | <span>●</span> <i>Proposed/Intention</i> |                                     | <span>✗</span> <i>Proposal rejected/Waiting for Global Solution</i> |  |  |
|-------------------------------|-----------|--|-------------------------------------|---|--|--|
| Country                       | Status    | Effective date                           | Type                                | Rate  | Applicable tax base  |  |
| Nigeria                       | ✓ Enacted | February 3, 2020                         | Significant Economic Presence (SEP) | 6 percent   | Gross turnover or income of more than NGN 25 million (\$32,775) from four types of digital activities: <ol style="list-style-type: none"> <li>providing streaming or downloading services of digital content, such as movies, music, games, and e-books to persons in Nigeria;</li> <li>transmitting data collected on Nigerian user activities on a digital interface, such as websites or apps;</li> <li>providing goods and services directly or indirectly through a digital platform; or</li> <li>providing intermediary services via a digital platform, website, or app linking suppliers to customers in the Nigerian market.</li> </ol> |  |
|                               | ✓ Enacted | July 1, 2023                             | Digital PE                          | N/A   | Revenue connected to digital PE  |  |
| Pakistan                      | ✓ Enacted | July 1, 2018                             | WHT                                 | 5 percent   | Payments for offshore digital services (such as online advertising, designing, creating, hosting or maintenance of websites, providing any facility or service for uploading, storing or distribution of digital content, online collection or processing of data related to users in Pakistan, any facility for online sale of goods or services, or any other online facility) performed by non-resident persons   |  |
|                               | ✓ Enacted | July 1, 2023                             | Digital PE                          | N/A   | Revenue connected to digital PE  |  |

# Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| <span>✓</span> <i>Enacted</i> <span>●</span> <i>Proposed/Intention</i> <span>✗</span> <i>Proposal rejected/Waiting for Global Solution</i> |           |  |                                     |             |   |
|--|-----------|--|-------------------------------------|-------------|---|
| Country  | Status    | Effective date   | Type                                | Rate        | Applicable tax base   |
|  | ✓ Enacted | July 1, 2024   | Significant Economic Presence (SEP) | TBD         | Transactions involving any goods, services, or property conducted by a non-resident with any person in Pakistan if the gross receipts from such transactions exceeds an amount that has yet to be prescribed. It also covers the downloading of data or software in Pakistan, as well as the systematic and continuous solicitation of business activities or digital interactions with users in Pakistan.  |
| Paraguay   | ✓ Enacted | January 1, 2021 (2022 if the user of the services uses a credit or debit card as a means of payment) | Non-resident Tax (INR)              | 15 percent  | <p>Income net of VAT from the provision of the following digital services by foreign suppliers:</p> <ol style="list-style-type: none"> <li>1. Digital distribution of multimedia content (games, movies, music, videos, among others)</li> <li>2. Data processing and storage in general, and the provision, development, or updating of software or applications in general</li> <li>3. Cable and satellite television</li> <li>4. Marketing and advertising</li> <li>5. Games of luck, chance, bets and the like</li> <li>6. Educational services provided through technological platforms</li> </ol> |
| Poland   | ✓ Enacted | July 1, 2020   | DST                                 | 1.5 percent | <p>Gross revenue of on demand provider resulting from:</p> <ol style="list-style-type: none"> <li>1. access to audio-visual media service and</li> <li>2. audio-visual commercial communication</li> </ol>  |

## Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| ✓ Enacted |            | ● Proposed/Intention |                 | ✗ Proposal rejected/Waiting for Global Solution |   |
|-----------|------------|----------------------|-----------------|---|---|
| Country   | Status     | Effective date       | Type            | Rate  | Applicable tax base   |
|           | ● Proposed | TBD                  | DST             | 3 – 7.5 percent                                 | Digital advertising or digital interfaces, targeted advertising, and user data transmission                     |
| Portugal  | ✓ Enacted  | February 17, 2021    | Exhibition levy | 4 percent                                       | Price charged (gross income) for audio-visual commercial communication included in video-sharing platforms      |
|           | ✓ Enacted  | February 17, 2021    | Annual levy     | 1 percent                                       | Gross income from subscription video-on-demand services   |
| Rwanda    | ✓ Enacted  | May 29, 2025         | DST             | 1.5 Percent                                     | Gross revenues derived from Rwanda by companies supplying digital services with substantial presence in Rwanda. |

# Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

✓ *Enacted*
● *Proposed/Intention*
✗ *Proposal rejected/Waiting for Global Solution*

| Country      | Status      | Effective date  | Type | Rate        | Applicable tax base  |
|--------------|-------------|-----------------|------|-------------|--|
| Sierra Leone | ✓ Enacted   | January 1, 2024 | DST  | 1.5 percent | <p>Turnover of all digital and electronic transactions, including:</p> <ol style="list-style-type: none"> <li>digital products, including subscription- based, downloadable and stream-able digital contents- satellite TVs, movies, music, apps, games, and e-books, software programs.</li> <li>services such as management and technical advisory, architectural or legal services.</li> <li>electronic data management, including transmission or collection of data about users in Sierra Leone.</li> <li>sale of goods or services directly, including online tickets and other services intermediating suppliers and customers through a digital platform.</li> <li>purchases via non-resident marketplaces or payment aggregators.</li> <li>digital gambling and betting activities.</li> <li>search engines and automated help desk services, e-learning platforms, audio, vision or digital media, transport hailing platforms, among others.</li> </ol> |
|              | ● Intention | TBD             | DST  | TBD         | TBD  |
| Slovakia     | ✓ Enacted   | January 1, 2018 | WHT  | 5 percent   | <p>Payments to foreign digital platforms facilitating transport and lodging services in Slovakia, acting as a marketplace for such services in Slovakia, not registered as a PE in Slovakia</p>  |
|              | ● Intention | TBD             | DST  | TBD         | TBD  |

# Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| ✓ Enacted |            | ● Proposed/Intention |      | ✗ Proposal rejected/Waiting for Global Solution              |  |  |
|-----------|------------|----------------------|------|--|--|--|
| Country   | Status     | Effective date       | Type | Rate   | Applicable tax base  |  |
| Spain     | ✓ Enacted  | January 16, 2021     | DST  | 3 percent  | Gross revenue from: <ol style="list-style-type: none"> <li>Digital intermediation services</li> <li>Digital advertising services</li> <li>Sale of user data generated through a digital interface</li> </ol> |  |
| Taiwan    | ✓ Enacted  | January 1, 2017      | WHT  | To be agreed with the tax authority                          | Payments to foreign providers for online advertisement and remunerations for e-services, such as online games, videos, audio broadcast, movie, TV series, music, and online platform services.               |  |
| Tanzania  | ✓ Enacted  | July 1, 2022         | DST  | 2 percent  | Turnover of non-resident digital service providers.  |  |
|           | ✓ Enacted  | July 1, 2024         | WHT  | 5 percent for digital contents. 3 percent for digital assets | Payments made to resident digital content creators and payments from the exchange of digital assets.   |  |
| Thailand  | ● Proposed | TBD                  | WHT  | 5 percent  | Income from e-commerce supplies of goods and services in the country, including online advertising, gaming, shopping, and others.  |  |
| Tunisia   | ✓ Enacted  | January 1, 2020      | DST  | 3 percent  | Detailed requirement to be determined by decree.   |  |
|           | ✓ Enacted  | January 1, 2025      | WHT  | 3 percent  | Payments made by delivery service providers to online sellers or audiovisual broadcasters, applicable if the seller fails to provide a tax identification number   |  |
| Türkiye   | ✓ Enacted  | January 1, 2019      | WHT  | 15 percent   | Payments made to providers of advertising services or intermediaries in return for the provision of such services via the Internet.  |  |

# Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| ✓ Enacted      |                     | ● Proposed/Intention |                         | ✗ Proposal rejected/Waiting for Global Solution   |  |
|----------------|---------------------|----------------------|-------------------------|---|--|
| Country        | Status              | Effective date       | Type                    | Rate  | Applicable tax base  |
|                | ✓ Enacted           | March 1, 2020        | DST                     | 7.5 percent but the President can reduce to 1 percent or increase to 15 percent                 | Gross revenue derived from in scope services (i.e., digital advertising services, sales of any audible, visual or digital content, services for the provision and operation of a digital platform by which users may interact with each other). No deductions would be available for expenses, costs, or tax.  |
| Uganda         | ✓ Enacted           | July 1, 2023         | DST                     | 5 percent   | Gross revenue derived from in scope services, i.e., data services; online gaming services; services delivered through an online marketplace or intermediation platform; digital content services, including accessing and downloading of digital content; cloud computing services; data warehousing; other services delivered through a social media platform or an Internet search engine; and any other digital services as the Minister may prescribe. |
| Ukraine        | ✗ Proposal rejected | TBD                  | IT economic zone        | Choice between current 18 percent corporate tax rate or switch to a new regime of 9 percent tax |  |
|                | ● Proposed          | January 1, 2026      | WHT                     | 5 percent   | Digital platforms must withhold and report income tax for Ukrainian individuals earning income through these platforms   |
| United Kingdom | ✓ Enacted           | April 1, 2020        | DST                     | 2 percent   | Revenue in excess of 25 million pounds derived from UK users from three types of digital activities:<br>1. Social media platforms<br>2. Internet search engine<br>3. Online marketplace  |
| United States  | ✗ Proposal rejected | August 15, 2025      | Digital advertising tax |   |  |



## Taxation of the digitalized economy – Direct taxes

[Back to TOC](#)

| ✓ <i>Enacted</i> |           | ● <i>Proposed/Intention</i> |   | ✗ <i>Proposal rejected/Waiting for Global Solution</i> |   |  |
|------------------|-----------|-----------------------------|---|--|---|--|
| Country          | Status    | Effective date              | Type  | Rate   | Applicable tax base   |  |
| Uruguay          | ✓ Enacted | January 1, 2018             | Non-resident income tax                               | 2.5 percent – 10 percent                               | 1. Digital advertising in Maryland  |  |
| Vietnam          | ✓ Enacted | January 1, 2021             | WHT   | Variable   | Income derived by non-residents from digital and e-commerce operations in Vietnam   |  |
|                  | ✓ Enacted | October 1, 2025             | PE  | Variable   | The PE definition includes e-commerce and digital platforms through which foreign enterprises provide goods and services in Vietnam                                   |  |
| Zimbabwe         | ✓ Enacted | January 1, 2019             | General income tax on certain digital services income | 5 percent  | Any amount receivable by or on behalf of an e-commerce platform/satellite broadcasting service provider domiciled outside Zimbabwe from persons resident in Zimbabwe. |  |

## Country specific detail – Direct taxes

| <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> |             |                    |   |      |
|---|-------------|--------------------|---|------|
| Country   | Status      | Latest development | Brief description   | Cite |
| ATAF  | ● Announced | April 4, 2024      | <p>The African Tax Administration Forum (ATAF) published a paper on the “Suggested Approach to Drafting Digital Services Tax Legislation”. The paper provides a draft legislation template for the introduction of a DST. This includes a suggested DST rate of 1 percent to 3 percent, with a suggested scope of revenue that includes the following:</p> <ul style="list-style-type: none"> <li>• Digital services revenue attributable to [Implementing Country] arising from online advertising services;</li> <li>• Digital services revenue attributable to [Implementing Country] arising from data services;</li> <li>• Digital services revenue derived from users located in [Implementing Country] arising from the provision of online marketplace or intermediation platform services, other than the following;</li> <li>• Digital services revenue derived from users, no matter where located, in respect to the facilitation of rental or use of real property located in [Implementing Country];</li> <li>• Digital services revenue derived from users, no matter where located, in respect to the facilitation of vehicle hire services which commence in [Implementing Country];</li> <li>• Digital services revenue derived from users located in [Implementing Country] arising from digital content services, online gaming services, and cloud computing services; and</li> <li>• Digital services revenue attributable to [Implementing Country] arising from any other digital services.</li> </ul> <p>The draft legislation template also includes provisions for determining digital services revenue, de minimis thresholds based on worldwide and country revenue, duty to file returns, appointing local representatives, etc.</p> <p>On July 12, 2023, following the Inclusive Framework’s announcement of the the updated “Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalisation of the Economy” package, the ATAF noted concerns regarding the commitment of the IF members not to impose newly enacted DSTs and relevant similar measures between January 1 and December 31, 2024 if a so-called critical mass of jurisdictions sign the Amount A Multilateral Convention (MLC) by the end of 2023.</p> | 1    |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country   | Status    | Latest development | Brief description   | Cite |
|-----------|-----------|--------------------|---|------|
|           |           |                    | On April 4, 2024, the ATAF published a policy paper titled "Taxing Digital Firms in Africa". The paper proposes various strategies for taxing the digital economy in Africa, which countries can adapt to their specific tax policy objectives. These strategies include waiting for the Pillar One Amount A MLC to take effect, implementing DST legislation that is not based on income tax as per ATAF's recommendation, incorporating DST legislation into the Income Tax Act, adopting alternative nexus rules, and implementing Article 12B of the United Nations Model Tax Convention. ATAF emphasizes that DSTs and the other alternative nexus rules have a broader scope than the Pillar One Amount A MLC and will apply to all or a significant number of digital firms operating in the country. In contrast, the MLC is estimated to apply to just over 100 multinational enterprises. |      |
| Argentina | ✓ Enacted | December 23, 2019  | On December 23, 2019, the Argentinian Congress passed Law 27,541, which among other things imposes on resident individuals and legal entities a temporary tax (PAIS) on the acquisition of goods and services from non-resident persons. The tax generally applies at a rate of 30 percent, but digital services are taxed at the lower rate of 8 percent. While like a DST it applies to the acquisition of goods and services from non-resident persons, Argentina's PAIS is not restricted to persons or companies engaged in the digital economy, and in fact applies a lower rate of tax to those companies. Argentina's PAIS also does not appear to be primarily related to BEPS concerns.   | 2    |
|           | ✓ Enacted | December 28, 2020  | Argentina has introduced changes to the taxation of online gambling. Effective December 15, 2020, a 5 percent tax is imposed on bets made through a digital platform in or from Argentina. The standard tax rate is increased to 10 percent where a non-resident participates directly or indirectly in the exploitation of the gambling platform and to 15 percent where the non-resident is in a non-cooperative or low/no tax jurisdiction.  | 3    |
|           | ✓ Enacted | April 14, 2021     | Since 2011 the tax law requires the recipient of digital services to pay the tax, without prejudice to the right of reimbursement by a non-resident provider. However, this requirement had been postponed until January 1, 2021, and there was no payment mechanism. On March 17, 2021, the province of Buenos Aires published Resolución Normativa ARBA 9/2, which established the turnover tax procedures for "surrogate taxpayers", in lieu of non-residents that provide digital services subject to tax, in the province of Buenos Aires. For these purposes, surrogate taxpayers are those receiving digital services from abroad and that, at the same time, are collection agents of national taxes. Digital services are defined as those provided via the  | 4    |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country   | Status | Latest development | Brief description  | Cite |
|-----------|--------|--------------------|--|------|
|           |        |                    | <p>internet and are subject to the tax when the provider has a significant digital presence in the province of Buenos Aires.</p> <p>Resolución Normativa 9/21 is immediately effective, and the tax payment corresponding to the month of February 2021 had a due date between March 18 and March 31, 2021 (the exact date of payment depending on the national tax identification number (CUIT) of the service recipient). The tax payment corresponding to January 2021 was due by March 31, 2021. It also establishes that the digital services tax is due (assuming there is a significant digital presence) when the foreign provider appears on a list published by the provincial tax authority.</p>  |      |
| Australia | ✗      | Proposal rejected  | <p>July 16, 2025</p> <p>In 2024, the Joint Select Committee on Social Media and Australian Society in Australia has advised the government to consider a levy on digital platforms as an additional revenue source. This recommendation aims to support the enforcement of the News Media Bargaining Code, which requires these platforms to compensate local news publishers for using their content. In its second report, the Committee proposed this levy to enhance systems oversight and suggested creating a fair and transparent method for distributing the generated revenue. This method would focus on the sustainability of small, independent, and digital-only publishers, especially those in underserved and rural areas.</p> <p>A formal proposal from the Australian Greens outlines a DST to apply from July 1, 2025, targeting companies with worldwide revenue over €750 million and Australian digital services revenue exceeding AUD \$20 million. The tax rate would be 3% on gross revenue from services like online marketplaces, advertising, social media, user data, and cloud computing.</p> <p>On July 4, 2025, during the Tax profession Digital Implementation Group meeting, the Australian Taxation Office (ATO) did not confirm the implementation on any DST but only that it has been involved in consultations and digital readiness efforts for Tax Time 2025.</p> <p>The Treasury's March 2025 response to the Board of Taxation's review of digital assets did not include a DST but addressed broader digital taxation issues.</p> | 5    |
| Austria   | ✓      | Enacted            | <p>February 24, 2020</p> <p>The Austrian DST is imposed effective from January 2020 at a rate of 5 percent on gross receipts from advertising services rendered by service providers in Austria with i) global gross receipts of Euro 750M or more, and ii) turnover in Austria from online advertising services of at least Euro 25M. A digital advertising service will be deemed to be rendered in Austria if: i) it is received on a device with an Austrian IP address, and ii) if the</p>  | 6    |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status      | Latest development | Brief description  | Cite |
|---------|-------------|--------------------|--|------|
|         |             |                    | advertisement addresses Austrian users. The Government also published the implementing regulation, which applies from January 2020.<br><br>Finally, the Ministry of Finance released guidance concerning the rules for registration and payment of the DST: monthly DST payments are to be remitted by the 15 <sup>th</sup> day of the second month following the subject month, with the initial DST payment for January 2020 due by mid-March 2020.  |      |
| Belgium | ● Announced | February 3, 2025   | On January 31, 2025, five Belgian political parties agreed on a coalition program outlining their governance principles and key policies. The agreement specifies that if no consensus is reached at the European or international level by 2027, Belgium will independently introduce a digital services tax. This tax will adhere to the principle of maintaining a level playing field, ensuring that it does not disproportionately burden Belgian companies compared to their foreign counterparts operating within the national market.  | 7    |
| Brazil  | ● Proposed  | April 10, 2025     | In April 2023, the Brazilian Ministry of Finance announced the intention to implement a digital tax. At this stage, however, the details of this tax are not yet clear.<br><br>In October 2022, a bill was introduced in Brazil's Lower House (Bill of Law n. 2630/2020), which would create a regulatory framework for content moderation on social media and other online platforms. Although not tax driven, the bill might have significant tax implications, including in particular: <i>"Art. 21 The sale of advertisement and boosting by social network and instant messaging service providers based abroad must be made and recorded by its representative in Brazil and in accordance with the local legislation governing advertising, whenever targeting the Brazilian territory."</i><br><br>Note that the proposed legislation does not specifically mention. Nonetheless, considering that the sale of advertisement and boosting would be recorded by the local representative, it would be taxed as a local revenue.<br><br>On March 18, 2025, Brazil's Congress considered a proposed legislation to introduce a "digital detox" tax, CIDE–Digital Detox, targeting revenue from digital platforms, social networks, streaming services, online games, and other interactive digital content. Applicable to both local and foreign providers, the tax would be 1 percent of gross revenue from these activities, with potential reductions for implementing measures like parental controls and data protection. Entities with annual gross revenue over BRL100 million would be subject to this tax. | 8    |

| <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> |                     |                    |  |      |
|---|---------------------|--------------------|--|------|
| Country   | Status              | Latest development | Brief description  | Cite |
| Cambodia  | ● Announced         | January 11, 2021   | <p>According to a study developed by the Centre for Inclusive Digital Economy at the Asian Vision Institute, Cambodia should consider adopting a digital services tax given the country's developing digital landscape and the growing revenue need. The Cambodian government has already signalled a willingness to consider ways to tax cross-border digital activity. However, it is unclear whether Cambodia is seriously considering a DST, a VAT on digital services, or something else. Cambodia's Ministry of Commerce confirmed that it had agreed on December 23, 2020, to establish internal teams to "learn more about mechanics and procedures in collecting taxes on digital services" globally and regionally, with input from relevant ministries and the private sector.</p>  | 9    |
| Canada  | ✓ Enacted/Announced | July 8, 2024       | <p><b>State of play</b></p> <p>On June 29, 2025, the Canadian government announced it would rescind the digital services tax (DST) in anticipation of a broader trade agreement with the United States. This decision came just one day before the first payments were due under the tax, which had been set to apply retroactively to digital services revenue earned from January 1, 2022, through December 31, 2024. The June 30, 2025 collection was halted, and Minister Champagne will bring forward legislation to rescind the Digital Services Tax Act.</p> <p><b>Background</b></p> <p>On July 3, 2024, Canada's Governor in Council finalized the enactment of the new three percent DST by setting the coming-into-force date as June 28, 2024.</p> <p>On April 16, 2024, Canada released its Federal Budget 2024. The budget reaffirms the country's intention to implement a DST regime, given the delays in finalizing the Pillar One Amount A.</p> <p>On November 21, 2023, the Finance Minister delivered the government's 2023 fall economic update. Bill C-59, which among others, includes legislation to implement the DST, received first reading in the House of Commons on November 30, 2023.</p> <p>On March 28, 2023, the Federal Budget for 2023 was presented, reiterating the government's commitment to the OECD BEPS 2.0 project. It also indicates, however, that unless the Pillar One multilateral convention is signed by mid-2023 with a 2024 effective date, the Government will move forward with the DST proposal. To that end, a revised draft DST legislative proposal will be released for public comments before introducing a bill in</p> | 10   |



✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>Parliament. The budget reiterates that the DST could be imposed as of January 1, 2024, in respect of revenues earned as of January 1, 2022.</p> <p>On July 12, 2023, the Minister of Finance issued a statement reiterating the support to the Two Pillar plan and also clarifying that Canada will move forward with its own DST from January 1, 2024 if the treaty to implement Pillar One has not come into force.</p> <p>On August 4, 2023, Canada published a revised draft of the DST legislative proposal and explanatory notes for public consultation. The public consultation was open through September 9, 2023.</p> <p><b>Background</b></p> <p>On April 19, 2021, Canada released the Federal Budget which would introduce a new 3 percent DST effective January 1, 2022, on revenue streams from online marketplace, social media, online advertising and user data of certain large businesses. The new DST would generally apply to businesses that meet both of the following thresholds:</p> <ul style="list-style-type: none"> <li>• Global groups revenues from all sources of €750 million or more in the previous calendar year; and</li> <li>• In-scope revenue related to Canadian users of more than CA\$20 million in the particular calendar year (the new DST would only apply to in-scope revenue over that CA\$20 million threshold).</li> </ul> <p>The DST liability would not be eligible for a credit against Canadian income tax payable but could be deductible in computing taxable income in certain circumstances. The budget also notes that the new DST would apply based on the calendar year (instead of the fiscal year).</p> <p>The budget only contains highlights of the new DST proposal but does not include draft legislation. The government invites stakeholder comments by June 18, 2021. It is also confirmed that that the DST would be a temporary measure that will be repealed once international consensus is reached.</p> <p>On December 14, 2021, Canada's Finance Minister delivered the government's 2021 fall economic update, which includes draft legislation to implement a 3 percent DST on revenue earned by "large businesses" from certain digital services that rely on data and content contributions from Canadian users. The tax would be imposed as of January 1, 2024, but only if the OECD/G20 Inclusive Framework's multilateral approach has not come into force by that time. In that event, the DST would be payable as of 2024 for revenues earned as of January 1, 2022.</p> |      |

✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country  | Status   | Latest development | Brief description   | Cite |
|----------|--|--------------------|---|------|
|          |  |                    | <p>On August 9, 2022, Canada Finance's Department reiterated that it will implement a DST on corporation with a large digital presence if the global solution deal fails.</p> <p>The Federal Budget for 2022, presented on April 7, 2022, includes a proposal to require digital platform operators to collect and report relevant information about sellers that use their platform to tax authorities (based on the OECD model rules). This measure requires platform operators to determine the jurisdiction of residence of their reportable sellers and report certain information about those sellers. Reporting platform operators are considered to be entities that are engaged in contracting directly or indirectly with sellers to make the software that runs a platform available for the sellers to be connected to other users, or entities collecting compensation for the relevant activities facilitated through the platform. Under these rules, the CRA will automatically exchange this information with partner jurisdictions. These exchanges would take place under provisions in tax treaties and similar international instruments. The measure would apply to calendar years beginning after 2023, with the first reporting and exchange of information to take place in early 2025 with respect to the 2024 calendar year.</p> <p>On August 30, 2024, the United States initiated dispute settlement consultations with Canada over its newly enacted DST. The United States claims that Canada's DST appears to target and discriminate against U.S. companies in favor of Canadian ones. The U.S. argues that this DST is inconsistent with the United States-Mexico-Canada Agreement, as it fails to accord equal treatment to U.S. services, service suppliers, investors, and their investments, compared to their Canadian counterparts.</p> |      |
|          | <span style="color: green;">✓</span> Enacted         | June 4, 2024       | On June 4, 2024, the Canadian Radio-television and Telecommunications Commission announced the introduction of a streaming tax. The regime, effective from September 1, 2024, will require online streaming services to contribute 5 percent of their Canadian revenues to support the Canadian broadcasting system.  | 11   |
| Chile    | <span style="color: red;">✗</span> Proposal rejected | January 14, 2020   | The August 2018 proposal to introduce a 10 percent digital tax on digital services provided by foreign platforms was abandoned.   | 12   |
| China    | <span style="color: blue;">●</span> Announced        | December 17, 2020  | A Chinese securities regulator said that the government should conduct an in-depth study to determine whether a digital services tax based on the concept that users create value should be implemented.  | 13   |
| Colombia | <span style="color: green;">✓</span> Enacted         | December 1, 2023   | On December 13, 2022, the 2022 Tax Reform was enacted. It includes a "significant economic presence" ("SEP") as a new nexus criteria for tax  | 14   |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status    | Latest development | Brief description   | Cite |
|---------|-----------|--------------------|---|------|
|         |           |                    | <p>liability in Colombia for foreign companies that sell goods or provide digital based services to Colombian users or clients. The SEP rules will entry into force as from January 1, 2024.</p> <p>A foreign entity will have a SEP in Colombia if the following requirements are met:</p> <ul style="list-style-type: none"> <li>– For the sale of goods, it is necessary that a foreign entity obtains income exceeding approx. USD275,000 per year and regularly sells goods to Colombian users/clients (there are certain rules to determine whether there is a regular interaction with Colombian users/clients). The rule includes an anti-fragmentation rule to aggregate sales performed by related parties.</li> <li>– For the provision of digital based services, the aforementioned requirements should be met and the service should fall within the list of services that would trigger a SEP in Colombia.</li> </ul> <p>Foreign companies with SEP in Colombia would be subject to tax in Colombia via withholding tax at a rate of 10%; for this purpose, the withholding agent would be either the issuer of the credit/debit card, the cash collecting agent or the payment gateway (further regulation to be issued by the Colombian Tax Authorities).</p> <p>Alternatively, the foreign company with SEP in Colombia may opt to file an annual tax return in Colombia and pay a 3% tax over the gross income derived from the sale of goods or the provision of services to Colombian users; in this case, the 10% withholding abovementioned would not be applicable.</p> <p>The Colombian SEP rules will not apply if the foreign entity is a resident in a jurisdiction with a Double Tax Treaty in force with Colombia or in case the Colombian SEP rules contravenes a future multilateral agreement on the matter.</p> <p>On November 27, 2023, the Ministry of Finance of Colombia issued the final regulations on the SEP rules. The regulations include specific definitions for terms, sourcing transactions to Colombia, and obligations of taxpayers who meet SEP in Colombia.</p> |      |
|         | ✓ Enacted | October 3, 2024    | <p>On August 28, 2024, the Colombian tax authority issued Ruling 713 further clarifying the significant economic presence (SEP) regime applicable to non-resident companies for the digital sale of goods and provision of services to clients or users located in Colombia. According to the Ruling, non-resident companies are considered to have an SEP in Colombia if they</p>  | 15   |

✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country        | Status   | Latest development | Brief description   | Cite |
|----------------|--|--------------------|---|------|
|                |  |                    | systematically interact with clients or users in the country, such as by providing the opportunity to view prices in Colombian Pesos (COP) or allowing payment in COP. The SEP regime applies when two conditions are met: the number of clients or users located in Colombia exceeds 300,000, and the income obtained in the year surpasses 31,300 UVTs. For related parties, these thresholds apply in an aggregate manner.   |      |
| Costa Rica     | <span style="color: green;">✓</span> Enacted         | November 19, 2019  | <p>A law regulates the provision of tourist rental services of non-traditional hosting via digital platforms and provides that taxes are to be paid by the trading companies. The law includes, among others, that: a) intermediaries provide information required by state institutions and withhold and pay the corresponding taxes; b) trading companies through online platforms, shall apply the corresponding taxes, regardless of whether are domiciled in Costa Rica or not.</p>  | 16   |
| Czech Republic | <span style="color: red;">✗</span> Proposal rejected | April 20, 2022     | <p>The DST bill seems to have come to a dead end as it was not approved by the Czech Lower House of Parliament before the parliamentary elections that took place in early October 2021 and the winning coalition supports the DST solution at the OECD level.</p> <p>By way of a background, the Government submitted to the Parliament the final bill which would introduce a 7 percent DST on revenues from i) targeted advertising on a digital interface (minimum threshold CZK 5M from in scope revenue from CZ); ii) the transmission of data about users and generated from users' activities on digital interfaces (minimum threshold CZK 5M from in scope revenue from CZ); iii) the making available to users a multi-sided digital interface which may facilitate the provision of supplies of goods and services among users (only if number of user accounts on the interface exceeds 200,000). The DST will only apply to corporate groups generating a turnover of more than Euro 750M and with a tax base relating to taxable digital services rendered in the CZ exceeding CZK 100M. Companies whose revenues from digital services do not exceed 10 percent of total revenues in Europe would be excluded from the DST, but subject to notification duties. Depending on the legislative process, the provision is expected to apply as an interim measure from mid-2020 until the end of 2024. However, the coalition parties submitted a proposal in June 2020 to reduce the rate of the draft DST from 7 percent to 5 percent and postpone the effective date to January 2021. The deputies did not have time to discuss a digital tax during the summer because the COVID-19 pandemic resulted in limited operation of the chamber. The related second-reading discussions did not begin until the second half of September 2020 and were soon terminated due to a lack of time.</p> | 17   |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country | Status      | Latest development | Brief description  | Cite |
|---------|-------------|--------------------|--|------|
|         |             |                    | <p>On March 11, 2021, the Minister of Finance announced that the DST bill could be discussed in the Parliament in April. If the proposal gets priority on the parliamentary agenda, the approval process could be quite fast, and the DST could be effective from mid-2021.</p> <p>On May 12, 2021, the DST bill went through the second reading in the Lower House of the Parliament. Several amendments were proposed and include:</p> <ul style="list-style-type: none"> <li>• postponing the effect of the law to January 1, 2022 or January 1, 2023;</li> <li>• reduction of the rate from 7 to 5 percent;</li> <li>• additional reduction of tax rate to 3 percent for all types of DST or only for mediation through digital platforms and sale of data;</li> <li>• excluding from the scope of DST the mediation of the sale of goods through digital platforms.</li> </ul> <p>On April 13, 2022, the Ministry of Finance announced that the government approved a draft law amending the Act on International Cooperation in Tax Administration for the implementation of new rules on the exchange of information on income generated by sellers through digital platforms (DAC7).</p> |      |
| Denmark | ● Announced | January 27, 2020   | <p>The Finance Ministers of Denmark, Finland, and Sweden released a joint statement on digital tax, indicating that the digital economy, as well as the traditional economy, should be taxed where value is created. The statement continues that, any solution reached should be a consensus-based solution, with a substantial part done by the OECD. However, the Danish Prime Minister announced Denmark's support to an EU-wide agreement on the DST controversy in case a global consensus is not reached.</p>   | 18   |
|         | ✓ Enacted   | December 19, 2023  | <p>On May 21, 2022, the Danish government reached an agreement with a majority in the Danish parliament on a new media deal, which amongst others will introduce a "cultural contribution" levy of 6 percent (5 percent originally proposed) on the gross receipts of digital streaming services in Denmark effective 2024. The proceeds will go to support both Danish public broadcasters and Danish filmmakers.</p> <p>In August 2022, the Government opened a public consultation (which ran until September 12, 2022) for a draft bill that would implement the levy, after they agreed that the proposed cultural contribution is not contrary to the OECD's Two-Pillar Agreement or the intentions it sets out in relation to the negotiations of the multilateral convention. The bill was expected to be</p>  | 19   |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country        | Status              | Latest development | Brief description  | Cite |
|----------------|---------------------|--------------------|--|------|
|                |                     |                    | <p>presented in the Parliament in late October 2022, but it was ultimately abandoned.</p> <p>On December 19, 2023, the Danish parliament approved the cultural contribution levy on on-demand audiovisual media service providers effective from January 1, 2024. The levy, based on the revenues generated in Denmark, is set at a basic rate of 2 percent for all on-demand streaming companies, with an additional 3 percent surcharge for companies that invest less than 5 percent of their Danish revenues in Danish content. The law applies to service providers established in Denmark or another EU member state that targets a Danish audience. However, it excludes service providers with an annual total gross receipt of less than DKK 15 million or with a small Danish audience, and on-demand audiovisual streaming services offered in connection with public service activities.</p>   |      |
| Ecuador        | ✓ Enacted           | July 31, 2024      | <p>Effective July 1, 2024, Ecuador introduced a 15 percent single income tax for sports betting operators. The tax applies to all income, including commissions, received by resident and non-resident operators from sports betting activities in Ecuador, after deducting the total prizes paid out. Sports betting activities are defined as predicting sports competition outcomes based on analysis and expertise and are considered distinct from other gambling services like casinos, bingos, and lotteries. Operators are required to register with the unique registry of taxpayers, provide tax information to the tax authority, and designate a local representative.</p> <p>On July 31, 2024, Ecuador's tax authority published Resolution No. NAC-DGERCGC24-00000029, establishing the obligations, deadlines, and procedures for the Single Income Tax for Sports Betting Operators (IRUPD). The Resolution mandates that both resident and non-resident sports betting operators register in the Unique Taxpayer Registry (RUC), issue e-receipts for sales and withholdings, and adhere to specified tax filing deadlines. The taxable base, excluding prize money won by players, is subject to a flat tax rate of 15 percent. Transitional provisions require current operators to register or update their RUC within a set timeframe from the resolution's effective date.</p> | 20   |
| Egypt          | ✗ Proposal rejected | September 21, 2019 | <p>In his 2020 draft budget proposal, the Egyptian Ministry of Finance announced plans to strengthen measures for the taxation of the digital economy. However, the proposal has come to a dead end.</p>   | 21   |
| European Union | ● Announced         | October 16, 2025   | <p><b>State of Play</b></p> <p>On October 16, 2025, the European Parliament's Subcommittee on Tax Matters held an interparliamentary meeting to discuss the taxation of digital</p>  | 22   |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>activities at national and international levels. The session focused on the potential implementation of a digital services tax (DST), its technical parameters, and the challenges of taxing digital companies. Speakers from the European Commission and several Member States emphasized the need for a multilateral solution, highlighting the OECD's Pillar One framework as the preferred approach. While DST is viewed as a possible interim measure, concerns over double taxation persist. The meeting also addressed administrative and economic implications of DST across jurisdictions.</p> <p>In April 2025, the Centre for European Policy Studies recently published a study, sponsored by the Greens/European Free Alliance group in the European Parliament, suggesting that a five percent digital services tax (DST) across the European Union could generate up to EUR 37.5 billion, providing a significant revenue source amid fiscal pressures. Alternatives to the DST, such as a digital permanent establishment tax, a destination-based cash-flow tax, and expanding VAT on digital transactions, are also being considered.</p> <p>Council Directive (EU) 2022/2523 on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the Union was adopted by the Member States entered into force on December 23, 2022. The Directive requires Member States to transpose the rules into domestic law by December 31, 2023, and to start applying the Income Inclusion Rule (IIR) for fiscal years beginning on or after December 31, 2023. The Undertaxed Profits Rule (UTPR) will be applied for fiscal years beginning on or after December 31, 2024.</p> <p>With respect to Pillar 1 and the withdrawn of the DSTs, the European Commission is expected to report on Pillar 1 progress by June 30, 2023, to the Council and, if appropriate, submit an alternative legislative proposal by end of 2023 to address digital economy taxation in the absence of the implementation of the Pillar One.</p> <p><b>Background</b></p> <p>The challenges of taxing the digitalized economy have been on the EU agenda for several years. The European Commission (EC) has focused on the BEPS 2.0 project to address these challenges. On December 22, 2021, the EC already published a proposed EU Directive to incorporate the Pillar 2 rules into EU law. Additionally, the indicative work program for the first half of 2022 further provides that the EC is also aiming at presenting a proposal to implement the OECD Pillar 1 proposal on July 27, 2022. In the context of a EU Pillar 1 implementation, the EC also published a proposal to establish</p> |      |

✓ *Enacted*● *Proposed/Announced*✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>the next generation of own resources for the EU budget which, inter alia, provides for a national contribution to the EU budget based on the share of 15 percent of the taxable profits of multinational enterprises re-allocated to each Member State under Pillar 1.</p> <p>Previously, the EU had suggested the introduction of an EU COVID digital levy as an EU own-resource measure. However, an EU digital levy measure has not been included in the published 2022 budget plan, most likely due to the agreed moratorium on new digital services taxes agreed as part of the October 8, 2021 OECD statement. It therefore appears that the EC has opted to replace the previously suggested EU digital levy measure with the national contribution to the EU budget from Pillar 1 revenues. If the Pillar 1 proposals are not ultimately agreed to internationally, the EC could seek to reintroduce EU digital levy proposals at a later stage, particularly given the need to fund the EUR 750 billion of funding committed as part of the European Union Recovery Instrument (NextGenerationEU) to mitigate the impact of the COVID-19 pandemic.</p> <p><b>EU Digital Levy – Background</b></p> <p>Previously, the EC launched two different initiatives to request feedback on a roadmap for the introduction of an EU digital levy:</p> <ol style="list-style-type: none"> <li>1. The Inception Impact Assessment - A first step would be to collect feedback and relevant information from stakeholders on the intended initiative, and to reflect the EC's understanding of the issue and the preliminary assessment of the expected economic, social, and environmental impact. Details of the tax policy options have not yet been set out, but the EC has confirmed that the expected legislative proposal would take into consideration any agreement reached by the OECD and would identify additional measures such as: <ul style="list-style-type: none"> <li>- A corporate income tax “top-up” to be applied to all companies conducting certain digital activities in the EU</li> <li>- A tax on revenues realized from certain digital activities conducted in the EU</li> <li>- A tax on digital business-to-business transactions conducted in the EU</li> </ul> </li> <li>2. Detailed public consultation - As a second step, January 18, 2021 the EU launched a more targeted public consultation questionnaire, asking</li> </ol> |      |



✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>stakeholders to provided their views on, among other items, the current challenges of taxation in the digitalized economy; possible solutions to address these challenges; the appropriate level for solving the issues (e.g., national, EU, beyond the EU or a combination of various levels); the scope of the digital levy; and the most appropriate options to determine where the revenues generated from digital activities are to be taxed.</p> <p>On March 22, 2021, the Council adopted rules under which the exchange of information under DAC is extended to digital platforms (DAC7). The rules impact both EU platform operators, as well as non-EU entities, if the latter facilitate reportable commercial activities of EU sellers/providers or the rental of immovable property located in the EU. Reportable activities include the rental of immovable property, personal services, sale of goods, and rental of any mode of transport. The reporting obligations apply with respect to cross-border and local commercial activities. Operators falling within the scope of DAC7 are required to collect and verify in line with certain due diligence procedures the information from sellers/providers on their online platform. Subsequently, certain information will be reported to the sellers/providers and to the relevant tax authority. Such information includes an overview of amounts paid to sellers from the reportable activities and platform fees and commissions incurred. Member States have until December 31, 2022 to transpose the amendments into national law. The Directive will apply from January 1, 2023 throughout the EU member states and the first reporting of data will be required by January 31, 2024.</p> <p>On March 23, 2021, the EU Parliament's Committee on Economic and Monetary Affairs (ECON) adopted a motion for an EU Parliament resolution on "Digital Taxation: OECD negotiations, tax residency of digital companies and a possible European digital tax. The report sets out the EU Parliament's views ahead of the final negotiations on a global reform within the OECD/G20 Inclusive Framework.</p> <p>On May 18, 2021, the EC unveiled its Communication on "Business Taxation for the 21st Century." With regard to the proposal for an EU digital levy (expected on July 14, 2021), it was noted that the levy would be independent of the global agreement on the international corporate tax reform and will be designed in such a way that it is compatible with WTO and other international obligations. The aim was for the digital levy to generate a new source of revenue that will support the longer-term sustainability of the EU budget and enable investments in the digital</p> |      |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country  | Status                        | Latest development | Brief description   | Cite |
|----------|-------------------------------|--------------------|---|------|
|          |                               |                    | <p>transition. The EC also noted that once set-up, the digital levy would co-exist with the Pillar 1 agreement, as implemented in EU law.</p> <p>On July 20, 2021, the EC postponed its work on a proposal for a digital levy. The delay was intended to allow countries in the OECD inclusive framework to finalize the details of the multilateral tax deal by October 2021.</p> <p>On September 7, 2021, the EC committed to tabling a proposal for a digital tax in October, whether or not an international agreement surfaces from OECD-led talks on new international tax rules for the world's largest firms.</p> |      |
|          | ● Announced                   | February 23, 2023  | The EU Commission launched an exploratory consultation on a network fee to ensure that digital players, including content and application providers, help pay for the necessary infrastructure investments. The consultation runs until May 19, 2023.   | 23   |
| Finland  | ✗ Waiting for Global Solution | June 1, 2018       | The Finance Ministers of Denmark, Finland, and Sweden released a joint statement on digital tax, indicating that the digital economy, as well as the traditional economy, should be taxed where value is created. The statement continues that, any solution reached should be a consensus-based solution, with a substantial part done by the OECD.  | 24   |
|          | ✓ Enacted                     | May 20, 2020       | <p>The Finnish tax authority issued a reminder to sharing economy platforms that they must report details of ride sharing and rental activities from 2021. The new rules state that the reporting obligation applies to passenger transport and property rental services when arranged via an intermediary. The annual information return must be sent by 1 February 2021 for the first time. This report must contain all the 2020 payments of rent, taxi fares, and other transportation fees.</p> <p>The tax authority intends to publish more detailed guidance on the requirements in due course.</p>                | 25   |
| Ethiopia | ✓ Enacted                     |                    | As of July 8, 2025, Ethiopia has amended its Income Tax Proclamation to include new measures, one of which is the introduction of a 5 percent Digital Services Tax (DST). This tax will apply to both resident and non-resident providers of digital services. The definition and scope of digital services will be further detailed in the forthcoming regulation.   | 26   |
| France   | ✓ Enacted                     | November 24, 2025  | <p><b>State of Play</b></p> <p>On November 24, 2025, the National Assembly voted against the 2026 Finance Bill. However, the DST-related amendments may be proposed again in the Senate.</p>  | 27   |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description   | Cite |
|---------|--------|--------------------|---|------|
|         |        |                    | <p>In October 2025, during the discussion of the 2026 Finance Bill, the National Assembly adopted an amendment to the Finance Bill increasing the rate of the French DST from 3% to 6%.</p> <p>This amendment also modifies the scope conditions applicable to liable groups. The new thresholds are set at €2 billion of global in-scope revenue and €25 million of French-source in-scope revenue, replacing the previous thresholds of €750 million and €25 million respectively.</p> <p>On September 12, 2025, the French Constitutional Council upheld France's digital services tax (DST) as constitutional, confirming a three percent levy on gross revenues from digital interfaces that enable user interactions and from targeted advertising provided in France by large digital companies. The Council validated cumulative thresholds—global revenues above EUR 750 million and French taxable revenues above EUR 25 million—to target firms with significant digital presence and to prevent artificial fragmentation, approved territorial rules based on user location or account creation to capture value generated by French users, and accepted the five-month calculation method used in 2019's rollout. The Council rejected arguments that a flat rate violates equality or unduly burdens business, stating that no constitutional rule requires a progressive rate or smoothing mechanism.</p> <p>On September 23, 2025, the Administrative Court of Cergy Pontoise ruled that bundled services relating to logistics and streaming services provided by an e-commerce platform fall outside the scope of France's digital services tax (DST). The court found that both services are economically independent from the taxpayer's digital marketplace. The court observed that the logistics support is billed separately, with usage extending beyond the taxpayer's platform, while streaming services are unrelated to marketplace access.</p> <p><b>Background</b></p> <p>The French DST law was signed and published in the official gazette; it is retroactively applicable as from January 1, 2019. A 3 percent tax applies on gross revenues deriving from i) the provision of a digital interface (i.e., intermediation services); and ii) targeted advertising and transmission of data collected about users for advertising purposes. The tax applies only to companies exceeding in the previous taxable year the following thresholds: i) Euro 750M in worldwide revenue and ii) Euro 25M in taxable services supplied in France; these thresholds must be calculated at the consolidated group level. The French Tax Agency launched a public consultation until May 23, 2020 on updated draft guidance on the scope as well as on the declaration and payment procedures of the DST.</p> |      |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country | Status     | Latest development | Brief description   | Cite |
|---------|------------|--------------------|---|------|
|         |            |                    | <p>The French Finance Minister Bruno Le Maire announced that France has agreed to suspend the collection of the 2020 DST until December 2020 in exchange for the U.S. agreeing to hold off on retaliatory tariffs on French goods. However, the tax authorities published a press release stating that the 2019 DST should not be affected by the suspension, and must be declared and paid in April 2020, after deduction of the single installment paid in November 2019. Mr. Le Maire further confirmed that the French DST will be levied for 2020 regardless of the outcome of the OECD discussions, given that as a result of the COVID-19 pandemic, agreement among the OECD members appears even less likely and a DST has never been more legitimate and more necessary as digital companies are doing better than most.</p> <p>On April 8, 2021, the French Tax Authorities released the final French DST regulations, which clarify certain important topics such as the definition of digital intermediation; the DST liability computation; the independent economic transaction, digital content and intragroup service exceptions.</p>   |      |
|         | ✓ Enacted  | September 23, 2025 | <p>On December 29, 2023, France published its Finance Law for 2024. This law includes a new "streaming music services tax" effective from January 1, 2024. The tax, set at 1.2 percent, applies to both paid and free services providing access to recorded music and music videos online in France. It is due on amounts exceeding EUR 20 million.</p>   | 28   |
|         | ● Proposed | June 19, 2024      | <p>On June 19, 2024, the French tax authority has initiated a public consultation on a draft guidance regarding the tax on the rental of phonograms and videomusic in France for private use. According to the draft guidance, Physical sales and rentals, as well as services rendered between professionals, are not subject to this tax. The tax base for the French digital content tax is the amount, excluding VAT, of revenues from amounts paid by the public for access to taxable content and sums paid by advertisers for their ads on the taxed service. Only the fraction of the subscription or price of the multi-service offer relating to access to taxable content is considered, and the tax base is the fraction of these revenues that exceeds EUR 20 million per calendar year, assessed separately for each service. The tax is due at each collection of the amounts constituting the tax base, provided that these collections have led, since the beginning of the calendar year, to exceed the threshold mentioned. The tax is payable by those who collect the amounts constituting the tax base. The tax is declared and liquidated like VAT, using the annex form to the VAT declaration n° 3310-A.</p> | 29   |

✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country   | Status                               | Latest development | Brief description  | Cite  |
|-----------|--------------------------------------|--------------------|--------------------|---|
| Germany   | <span style="color: red;">✗</span>   | Proposal rejected  | June 17, 2020      | <p>The German Federal Ministry of Finance and the Finance Ministries of the German states have decided that withholding tax should not be imposed on payments for digital advertising services. This legal view has been upheld by the German Federal Ministry of Finance in the form of official guidance. The director general of international taxation for the German Federal Ministry of Finance and chair of the OECD's Committee on Fiscal Affairs said that Germany is open to meeting other countries halfway on Pillar 1 of the OECD's work on a global corporate tax overhaul, as long as it includes minimum taxation under Pillar 2.</p> <p>30</p>   |
|           | <span style="color: blue;">●</span>  | Proposed           | June 3, 2025       | <p>On June 3, 2025, Germany announced consultations on a proposed 10 percent digital advertising tax, modelled after Austria's 5 percent digital advertising levy.</p> <p>31</p>  |
| Greece    | <span style="color: green;">✓</span> | Enacted            | July 16, 2019      | <p>The Greek Independent Authority for Public Revenue posted online a circular explaining the taxation of short-term rentals in the sharing economy through digital platforms. The circular explains: 1) a property manager's obligation to register the property and file returns; 2) the registration procedure for properties and beneficiaries; 3) filing procedures; 4) penalties for posting a property on digital platforms without a registry number; 5) the requirement to account for commission or bonus revenue as business income.</p> <p>32</p>   |
|           | <span style="color: green;">✓</span> | Enacted            | September 19, 2024 | <p>On September 16, 2024, Greece enacted Law 5135/2024, replacing the existing stamp duty with a digital transaction fee effective December 1, 2024. This fee will apply to various transactions, including loans, bank accounts, property sales, business transfers, compensations, fees, interest, bank checks, subscriptions, prizes, and other specified contracts. It also covers transactions involving state or general government entities, such as real estate leases, subsidies, grants, fines, and court documents. The fee applies regardless of where the transaction occurs, as long as at least one party has tax residency or a permanent establishment in Greece related to the transaction.</p> <p>33</p> |
| Hong Kong | <span style="color: green;">✓</span> | Enacted            | March 27, 2020     | <p>On March 20, 2020, the Hong Kong Inland Revenue Department (IRD) published a revised version of Departmental Interpretation and Practice Notes No. 39 ("revised DIPN 39"), which addresses various key issues concerning taxation of e-commerce transactions and digital assets. Among other things, the IRD has: 1) set out what it considers to be the key value creators of an e-commerce business; 2) confirmed that, in the absence of any specific provisions in the Inland Revenue Ordinance (IRO) that deal with the taxation of e-commerce, the tax consequences of e-commerce transactions are to be determined in accordance with section 14 of the IRO;</p> <p>34</p>  |

✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status                                       | Latest development | Brief description   | Cite |
|---------|--|--------------------|---|------|
|         |  |                    | 3) provided some practical guidance on how to determine the locality of profits in the context of e-commerce transactions; 4) took the view that in the context of e-commerce, the decisive criterion to determine the existence of a PE may be whether the activities of a fixed place of business form an essential and significant part of the e-commerce business as a whole or whether those go beyond preparatory or auxiliary activities. To be noted, the statement contained in the previous DIPN that the taxation of e-commerce is to follow a principle of neutrality and that the ordinance is to be applied to e-commerce on a basis consistent with conventional business, has now been removed.   |      |
| Hungary | <span style="color: green;">✓</span> Enacted | January 1, 2024    | Effective from July 1, 2017, Hungary requires businesses to pay tax on advertising revenue. The National Tax and Customs Administration issued an updated guide, explaining which publishers are subject to the rules; the 7.5 percent tax rate on advertising revenues exceeding HUF 100M per year; a tax exemption for advertising revenues under HUF 100M per year; procedures to calculate the tax base; and payment deadlines based on a company's tax year. However, as a temporary measure, the advertisement tax rate has been reduced to 0 percent, effective from July 1, 2019 through the December 31, 2024.   | 35   |
| Iceland | <span style="color: blue;">●</span> Proposed | October 09, 2025   | On October 9, 2025, Iceland proposed introducing a five percent cultural contribution tax on revenues earned by streaming services offering video-on-demand (VOD) in Iceland effective January 1, 2026. The tax would decrease to zero percent if the streaming service directly invests at least five percent of that revenue in new Icelandic content. The proposal exempts public service media, small services (under ISK 20 million in annual revenue or under one percent of Icelandic households), and services that only carry sports, news, or religious content.  | 36   |
| India   | <span style="color: green;">✓</span> Enacted | April 1, 2020      | <p>The Finance Act, 2018, introduced the concept of 'Significant Economic Presence' (SEP) to provide that SEP of a non-resident in India shall constitute business connection in India. Any income attributable to such SEP will be taxed in India. However, considering the restrictive definition of PE in the tax treaties, the insertion of SEP under domestic tax laws does not have any practical impact on taxpayers covered by tax treaties. In the memorandum to the Finance Bill 2018, the Indian Government clarified that unless corresponding modifications are made in the tax treaties, the existing PE concept in such treaties would continue to govern the taxation of cross border profits.</p> <p>The Finance Act 2020 provided for: (i) modification and deferral of the SEP provisions of to April 1, 2021 (i.e., Financial Year 2021-22), with the</p> | 37   |

✓ Enacted

● Proposed/Announced

✗ Proposal rejected/Waiting for Global Solution

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
|         |           |                    | <p>expectation that the OECD will soon reach a consensus and provide an updated work plan for the digital economy; (ii) the expansion of source rules to include income from advertisements that target customers residing in India or having internet protocol address located in India, income from the sale of data collected from person residing in India or having internet protocol address located in India, and income from sale of goods and services using such data collected from such person, which are effective from April 1, 2020 (i.e., Financial Year 2020-21). However, the deferral of the SEP provision did not pass and accordingly the SEP rules are effective from April 1, 2021. Further, in 2021, the Central Board of Direct Taxes (CBDT) notified the thresholds for constituting SEP in India. Considering aforesaid modification to SEP provisions, SEP is now defined to mean:</p> <ul style="list-style-type: none"> <li>(a) transaction in respect of any goods, services or property carried out by a non-resident with any person in India including provision of download of data or software in India, if the aggregate of payments arising from such transaction or transactions during the year exceeds INR 20 million; or</li> <li>(b) systematic and continuous soliciting of business activities or engaging in interaction with 0.3 million users in India</li> </ul> <p>Further the transactions or activities shall constitute SEP in India, whether or not the non-resident has a residence or place of business in India or renders services in India or agreement for such transactions/ activities entered in India.</p> |      |
|         | ✓ Enacted | September 29, 2020 | <p>Effective October 1, 2020, an e-commerce operator must withhold 1 percent tax on the gross amount of sale of goods/provision of services facilitated by it through its digital or electronic facility or platform. Any payment made by a purchaser of goods/recipient of services directly to an e-commerce participant shall also be considered in such gross amount.</p> <p>E-commerce participant has been defined as a person resident in India selling goods or providing services or both, including digital products, through the digital or electronic facility or platform. E-commerce operator has been defined as a person who owns, operates or manages digital or electronic facility or platform for electronic commerce.</p> <p>Withholding is not required on payments made to individual e-commerce participants if their gross sales of goods or services through the e-commerce platform does not exceed INR 0.5 million.</p>  | 38   |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country | Status     | Latest development | Brief description  | Cite |
|---------|------------|--------------------|--|------|
|         |            |                    | <p>The CBDT has issued few guidelines to provide clarity on the applicability of tax withholding on e-commerce operators.</p>  |      |
|         | ✗ Repealed | March 26, 2025     | <p><b>State of Play</b></p> <p>Effective April 1, 2025, India abolished the 6 percent equalization levy applicable on payments to non-residents in respect of online advertisement services. Introduced in 2016, the equalization levy applied to online advertisement services, with the Indian customer acting as withholding agent.</p> <p>Effective August 1, 2024, India repealed the 2 percent equalization levy based on stakeholder concerns regarding its ambiguity and compliance burden. However, the 6 percent levy on advertising services is unaffected, and remains in effect.</p> <p>After the repeal of the levy was announced, the Indian Finance Minister has indicated in later press comments that this move was intended to reflect a “positive approach to Pillar 1 and Pillar 2” negotiations.</p> <p><b>Background</b></p> <p>Effective June 1, 2016, a 6 percent Equalisation Levy applies to specified services (such as online advertising, any provision for digital advertising space or any other facility or service for the purpose of online advertisement and includes any other service) where the gross receipts, from an Indian resident or a non-resident with an Indian PE, are equal to or more than INR 100,000 annually.</p> <p>The Finance Act, 2020 expanded the scope of the Equalization Levy to include consideration received by “e-commerce operators” from “e-commerce supply or services.” Effective April 1, 2020, such consideration is subject to a 2 percent levy. An “e-commerce operator” is defined to mean a non-resident who owns, operates or manages a digital or electronic facility or platform for online sale of goods or online provision of services or both. The “e-commerce supply or services” on which the levy applies are: a) online sales of goods owned by the e-commerce operator; b) online provision of services provided by the e-commerce operator; c) online sales of goods or provision of services facilitated by the e-commerce operator (i.e., where he provides a platform for others to supply goods or provide services); and d) any combination of the above. The levy is applicable when the goods or services are provided / facilitated by the e-commerce operator to: a) a person resident in India; b) a non-resident for sales of</p> | 39   |



✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>advertisements targeted at, or sales of data collected from persons resident in India or using an IP address in India; and c) a person who buys goods or services or both using an IP address located in India.</p> <p>The following are excluded from the scope of levy: a) non-resident e-commerce operators with a PE in India and the e-commerce sales or services are effectively connected to such PE; b) the services are subject to 6 percent Equalisation Levy; and c) the sales, turnover or gross receipts in respect of transactions subject to the levy are less than INR 20 million in a year. Unlike in the case of the 6 percent Equalisation Levy on specified services where the resident payer was responsible to deduct and pay the levy, the 2 percent Equalisation Levy on e-commerce operators is to be discharged by such non-resident operator itself, on a quarterly basis.</p> <p>The CBDT issued Notification n. 87/2020 on the Equalisation Levy (Amendment) Rules, 2020, which applies effective October 28, 2020. The Notification essentially adopts the existing rules for the 6 percent Levy, so they also apply for the new 2 percent levy on e-commerce. This includes requirements for payers / e-commerce operators to deduct / pay the levy and to electronically file an annual return by 30 June immediately following the financial year.</p> <p>The Finance Act 2021 clarified the application of the 2 percent Equalisation Levy, noting that:</p> <ul style="list-style-type: none"> <li>Income-tax on Royalty/Fee for Technical Services and Equalisation levy are mutually exclusive effective from April 1, 2020. Equalization Levy shall not apply if consideration is taxable as Royalty or Fee for Technical Services.</li> <li>The consideration on which levy is applicable includes the value of the underlying goods or services, irrespective of the ownership of goods or the person providing the services, except where underlying goods or services are owned or provided by an Indian resident or Indian PE of a non-resident.</li> <li>'online sale of goods' and 'online provision of services' shall include one or more of the following online activities (Transactions in scope): <ul style="list-style-type: none"> <li>The acceptance of offer for sale;</li> <li>The placing or acceptance of purchase order;</li> <li>The payment of consideration; and</li> <li>The sale of goods or services, whether partly or wholly.</li> </ul> </li> </ul> |      |

✓ Enacted

● Proposed/Announced

✗ Proposal rejected/Waiting for Global Solution

| Country   | Status | Latest development          | Brief description  | Cite |
|-----------|--------|-----------------------------|--|------|
| Indonesia | ✗      | Waiting for global solution | <p>The Government issued Regulation No. 1 for 2020 which, among other things, addresses the tax treatment of activities conducted as e-commerce transactions. Overseas sellers and e-commerce platform providers are required to appoint a representative in Indonesia to be responsible for paying and reporting the taxes related to these transactions. In particular, trade activities via e-commerce will be subject to the following taxes:</p> <ul style="list-style-type: none"> <li>Corporate Income Tax payable by deeming “PE” of overseas e-commerce companies which have a significant economic presence in Indonesia. The significant economic presence will be determined further by the Minister of Finance and would cover consolidated gross revenue; sales amounts in Indonesia; and/or the size of active members in Indonesia;</li> <li>Electronic Transaction Tax will be imposed on sales to Indonesian buyers/users if the above PE concept cannot be applied based on specific provisions of a Tax Treaty. However, further implementing measures are required for the new tax to go into effect.</li> </ul> <p>Note, although the law was enacted, implementing regulations are still pending and accordingly the measures are not fully implemented.</p> <p>On June 8, 2020, the Indonesian Directorate General of Taxation issued FAQs on: i) the expansion of the criteria and significant economic presence (SEP) for PEs for income derived from Indonesia by foreign digital entities that don't have a physical presence in Indonesia; ii) the application of the SEP principle in Indonesia; and iii) the future plan to impose income taxes on electronic transactions performed by foreign entities.</p> <p>The Finance Ministry said that Indonesia is waiting for a global consensus on digital taxation rather than implementing a digital services tax of its own.</p> | 40   |
|           | ✗      | Waiting for Global Solution | <p>Israel's Ministry of Finance and the Israel Tax Authority have considered the introduction of a 3 percent to 5 percent tax on revenue that would be modelled on the DST implemented in France. However, On June 22, 2021, the Ministry of Finance announced that Israel would adopt the OECD Digital Economy Taxation Plan, which would provide a framework for Israel to collect taxes from digital gains derived from the Israeli digital activity of global corporations through Pillars One and Two.</p>  | 41   |
| Israel    | ✓      | Enacted                     | <p>Foreign entity deriving income from online transactions with Israeli residents will create a PE, and thus be subject to taxation in Israel, if it has a significant digital presence in Israel. Effective from April 12, 2016.</p>  | 42   |
|           | ✓      | Enacted                     | <p><b>State of Play</b></p>  | 43   |
| Italy     | ✓      | Enacted                     |  |      |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>On October 15, 2024, the Italian government approved the draft 2025 Budget Law, which proposes to eliminate the current revenue thresholds, which require companies to have worldwide revenues of at least EUR 750 million and at least EUR 5.5 million from digital services in Italy to be liable for DST. Under the proposed changes, any business generating revenue from digital services in Italy will become subject to DST, along with related accounting and reporting obligations. The law would take effect on January 1, 2025, without a transitional period.</p> <p>On June 3, 2025, the Italian Tax Authority clarified that bonuses awarded to users of online games are excluded from the taxable base of the DST. Only the actual remuneration received by platform operators for intermediation services constitutes taxable digital revenue.</p> <p><b>Background</b></p> <p>Effective January 1, 2020, Italy introduced a 3 percent DST on gross revenue derived from i) advertising on a digital interface, ii) multilateral digital interface that allows users to buy/sell goods and services, iii) the transmission of user data generated from using a digital interface. The DST applies to both resident and non-resident companies with total revenue in the prior year of at least Euro 750M and total revenue from digital services supplied in Italy of at least Euro 5.5M.</p> <p>On December 17, 2020, the Italian tax authorities issued a draft decree providing guidance on the Italian DST, addressing scope and sourcing rules, and providing additional guidance on registration and payment processes. The Italian tax authority has launched a public consultation until December 31, 2020 on the decree.</p> <p>On March 23, 2021 the Italian Tax Authorities published on their website the Circular no. 3/2021 to clarify various aspects of the application and administration of the Italian DST. Key aspects include: i) the nature of the digital services falling within the scope of the DST; ii) services that fall outside the scope of the DST; iii) how to calculate the taxable revenue and the proportion of that revenue deriving from services linked to the Italian territory; and iv) the registration process, the preparation of accounting documentation and the submission of the DST return.</p> <p>Decree Law 41/2021 further extends the deadline for DST payments and return. The payment of the DST has been extended from February 16 to May 16 of the calendar year following the year in which the taxable year is realized, and the submission of the related return from April 30 to June 30 of</p> |      |

| <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> |             |                    |  |      |
|---|-------------|--------------------|--|------|
| Country   | Status      | Latest development | Brief description  | Cite |
|   |             |                    | <p>the calendar year following the year in which the taxable year is realized. The extended deadlines apply to FY2020 as well.</p> <p>On October 21, 2021, Italy signed a joint statement with other countries for a transitional system where (i) Italy is allowed to continue to apply existing unilateral measures until Pillar 1 comes into effect; and (ii) an interim credit will be provided against the tax liability associated with Amount A in cases where the DST that has accrued during the interim period (between January 1, 2022 and the earlier of the date Pillar 1 comes into effect or until December 31, 2023) exceeds the tax due under Pillar 1 within the first full year of implementation.</p> <p>On March 22, 2022, the Italian Tax Authority published Ruling 149/2022 which addressed two specific issues: 1) whether the placing of targeted advertising where the sale of advertising space takes place through intermediaries and advertising exchanges is within the scope of the DST; and 2) whether advertisements based on a geographical profiling of the user through the data provided by the Internet Service Provider (ISP) would qualify as 'targeted' advertising.</p> <p>In November 2022, a proposal to increase the DST rate from 3 to 6 percent is being considered and may be included in the 2023 Budget Law, which is now being drafted.</p> <p>On March 20, 2024, the Italian Economy Minister announced that Italy might retain and modify its DST if efforts to implement the OECD's Pillar 1 do not pass.</p> |      |
| Japan   | ● Announced | August 23, 2021    | <p>On August 19 the Ministry of Economy, Trade, and Industry published an interim report by a panel of international tax practitioners, industry representatives, and academics that first met in March to evaluate a range of possible tax reforms, including the imposition of a digital services tax.</p> <p>The panel said that while it expects early implementation of Pillar 1 of the OECD's global tax reform plan, which would revise profit allocation and nexus rules to allow market jurisdictions more taxation rights over the residual profits of multinational enterprises, "it is necessary to consider preparations in the unlikely event that . . . Pillar 1 is delayed."</p> <p>Any unilateral DSTs imposed by other countries should be promptly abolished when Pillar 1 comes into effect, the panel said. It made no recommendation as to whether Japan should consider implementing a DST.</p>   | 44   |
| Kenya   | ✓ Enacted   | September 22, 2025 | <b>State of Play</b>   | 45   |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>On September 22, 2025, the Kenya Revenue Authority opened consultation on the draft Significant Economic Presence (SEP) Tax Regulations. The draft regulations define a wide scope of covered services, including digital content (eBooks, apps, films), streaming and subscription media, software and cloud services, AI and automated support tools, online education and ticketing, marketplace intermediation, user data monetization, digital payments and asset transfers. A user is deemed to be in Kenya based on IP address, billing details, or device location. The tax base is set at 10 percent of gross turnover, taxed at 30 percent, excluding VAT. Gross turnover includes payments for services or platform commissions. Taxpayers must file monthly returns and remit SEP tax by the 20th of the following month. The KRA may require third parties (e.g., banks or agents) to deduct and remit tax on behalf of noncompliant providers. Failure to comply may result in personal liability for the tax. The SEP regime now captures direct-to-consumer sellers, and shifts liability to the seller rather than the platform. Businesses previously registered under the digital services tax are not required to re-register but must comply with the new SEP framework.</p> <p>On June 26, 2025, Kenya's president assented the Finance Act, 2025, which, among other things, broadens the scope of the VAT rules for non-resident digital services providers to include internet-based radio and television broadcasting services, thereby taxing streaming services that were previously untaxed. It also expands the significant economic presence (SEP) tax to cover services provided through the internet or an electronic network beyond just those offered through digital marketplace and removes the KES 5 million registration threshold. Additionally, the bill clarifies that digital services provided to Kenyan consumers are subject to excise tax and extends this tax to services offered via the internet or an electronic network, beyond just those offered through digital marketplace.</p> <p>On April 29, 2025, Kenya published the Finance Bill, 2025, which, among other things, proposes expanding the significant economic presence (SEP) tax to cover services provided through the internet or an electronic network beyond just those offered through digital marketplace and removing the KES 5 million registration threshold.</p> <p><b>Background</b></p> <p>The Finance Act 2019 was published in the Official Gazette. It amends the Income Tax Act by listing "income accruing through a digital marketplace" as income chargeable to tax. It also defines a digital marketplace as "a platform that enables the direct interaction between buyers and sellers of</p> |      |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description   | Cite |
|---------|--------|--------------------|---|------|
|         |        |                    | <p>goods and services through electronic means". The provision is effective as of November 7, 2019.</p> <p>In December 2020, the Cabinet Secretary, National Treasury issued final DST Regulations, 2020 as a guide for the DST implementation. The DST entered into effect on January 2, 2021 with the first return and payment covering January 2021 due for submission to the Kenya Revenue Authority by February 20, 2021. The DST rate is 1.5 percent of the gross transaction value. The gross transaction value is the payment received as consideration for the digital service. In the context of a digital marketplace provider, it is the commission or fee paid for the use of the platform. DST is payable on the following services:</p> <ol style="list-style-type: none"> <li>1. Downloadable digital content including downloadable mobile applications, e-books and films;</li> <li>2. Over-the-top services including streaming television shows, films, music, podcasts and any form of digital content;</li> <li>3. Sale of, licensing of, or any other form of monetising data collected about Kenyan users which has been generated from the users' activities on a digital marketplace;</li> <li>4. Provision of a digital marketplace;</li> <li>5. Subscription-based media including news, magazines and journals;</li> <li>6. Electronic data management including website hosting, online data warehousing, file-sharing and cloud storage services;</li> <li>7. Electronic booking or electronic ticketing services including the online sale of tickets;</li> <li>8. Provision of search engine and automated held desk services including supply of customised search engine services;</li> <li>9. Online distance training through pre-recorded media or e-learning including online courses and training; and</li> <li>10. Any other service provided through a digital marketplace</li> </ol> <p>According to the Regulations, DST is payable by the digital service provider. Further, online services provided by Government institutions are not subject to DST. It also important to note that DST shall not apply to income derived from Kenya by non-resident persons from the business of transmitting messages by cable, radio, optical fibre, television broadcasting, Very Small Aperture Terminal (VSAT), internet, satellite or by any other similar method</p> |      |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description   | Cite |
|---------|--------|--------------------|---|------|
|         |        |                    | <p>of communication. Similarly, DST shall not apply to income which are subject to withholding tax in Kenya. Some of these incomes include management and professional fees earned through a digital marketplace. Foreign companies which provide digital marketplace services to consumers in Kenya will be subject to the DST.</p> <p>Effective July 1, 2021, Kenya published Finance Act, 2021 which introduces the following changes:</p> <ul style="list-style-type: none"> <li>• To impose income tax on income accruing from businesses carried out over the internet or an electronic network, including through a digital marketplace.</li> <li>• A new definition for a digital marketplace. A “digital marketplace” will mean an online platform which enables users to sell or provide services, goods or other property to other users. expand the definition of digital services to include supplies made over the internet or an electronic network in addition to those made through a digital marketplace.</li> <li>• To limit the imposition of the DST to non-resident persons only.</li> <li>• To exempt non-resident businesses that transmit messages via cable, radio, fiber, TV broadcasting, VSAT, internet, satellite or other such methods of communication from DST.</li> <li>• To exempt income subject to withholding tax from DST.</li> </ul> <p>On April 12, 2022, the lower House of the Parliament received Finance Bill 2022 which includes the proposal to increase the DST rate from 1.5 to 3 percent.</p> <p>On May 4, 2023, Finance Bill 2023 was presented to the Parliament. The draft legislation proposes a 15 percent WHT on digital content creators that offer website and social media advertising, paid sponsorships, affiliate marketing, and subscriptions. The tax would also apply to licensing fees that creators pay for music or photographs they use in their projects, according to the bill. Crowdfunding for content creators or other individuals would be in scope of the new tax.</p> <p>On June 26, 2023, the Kenyan president signed the Finance Act 2023 into law.</p> |      |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description   | Cite |
|---------|--------|--------------------|---|------|
|         |        |                    | <p>On July 28, 2023, the Kenyan Court of Appeal lifted a previous suspension of the implementation of the Finance Act 2023. As such, the Act is now effective pending the hearing and determination of the appeal.</p> <p>On June 26, 2024, Kenyan President announced the withdrawal of the Finance Bill 2024, in its entirety, due to sustained public pressure. The bill included measures that would have replaced the digital services tax with a significant economic presence standard and introduced a withholding tax on income deemed to have accrued in or derived from a digital marketplace from the making or facilitation of payments by the digital marketplace. On May 9, 2024, Kenya introduced the Finance Bill 2024 to parliament. Among other things, the bill proposes to repeal the DST and replace it with a "Significant Economic Presence Tax" (SEP Tax). This tax would be imposed on non-residents whose income from the provision of services is derived from or accrues in Kenya through a business conducted over a digital marketplace. The SEP Tax would be levied at a rate of 30 percent of the "deemed taxable profit". The taxable profit is deemed to be 20 percent of the gross turnover. If enacted, the tax will take effect from January 1, 2025.</p> <p>On December 11, 2024, the President signed into law the Tax Laws (Amendment) Bill 2024 and the Tax Procedures (Amendment) Bill 2024, which among others, establish a significant economic presence (SEP) tax, replacing the 1.5 percent digital services tax (DST). The SEP tax is charged at 30 percent on taxable profit of non-resident persons whose income from the provision of services is derived from, or accrued in, Kenya through a business carried on through a digital marketplace. The taxable profit is deemed to be 10% of the gross turnover from taxable services. The SEP tax replaces the DST that was charged at 1.5% of the gross transaction value. The SEP tax does not apply to:</p> <ul style="list-style-type: none"> <li>– a non-resident person who offers the services through a permanent establishment;</li> <li>– income of non-resident persons arising from the business of transmitting messages by cable, radio, optical fibre, television broadcasting, very small aperture terminal (VSAT), the internet, satellite or by any other similar method of communication that is chargeable;</li> <li>– income subject to withholding tax;</li> </ul> |      |



✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country         | Status                                       | Latest development | Brief description  | Cite |
|-----------------|--|--------------------|--|------|
|                 |  |                    | <ul style="list-style-type: none"> <li>– a non-resident person providing digital services to an airline in which the government of Kenya has at least 45% shareholding; and</li> <li>– a non-resident person with an annual turnover of less than KES 5 million.</li> </ul>  |      |
| <b>Laos</b>     | <span style="color: red;">✗</span> Rejected  | February 8, 2023   | <p>On February 24, 2022, the Ministry of Finance issued Notification No. 0541/MOF according to which non-resident companies that provide e-commerce and digital platform services (such as online music and films, streaming services, online advertisement, and online travel and accommodation booking services) to users in Laos should register and obtain a tax identification number (TIN) on the Tax Department's TaxRIS webpage and calculate and pay profit tax on income derived from Laos consumers based from such services (DPT).</p> <p>Following November's 2022 consultation and updated guidelines, the Laotian Government is redrafting local regulations to focus on VAT regime only and drop the DPT requirement. Thus, non-resident digital services providers, without a physical presence in Laos, will not be required to pay tax on income sourced to Laos.</p> | 46   |
| <b>Latvia</b>   | <span style="color: red;">✗</span> Rejected  | December 18, 2019  | The Latvian government commissioned law firm Primus Derling to conduct a study to determine the increase of tax revenue based on the assumption that the country levies a 3 percent DST. However, no further action has been taken so far.   | 47   |
| <b>Malaysia</b> | <span style="color: green;">✓</span> Enacted | April 7, 2021      | The Director General of Inland Revenue issued a practice note on the tax treatment of digital advertising provided by non-residents. Payments made to a non-resident digital advertiser will be subject to withholding tax if the non-resident does not have a PE or a business presence in Malaysia. Domestic withholding tax rules vary depending on whether the payment is deemed to be a royalty or for non-resident services. The Inland Revenue further updated Guidelines on e-commerce transactions to include: 1) definitions and the scope of e-commerce transactions, digital currency, tokens, and royalties; 2) an expanded set of examples relating to e-commerce business models; 3) the taxation of income derived from e-commerce transactions; and 4) the scope and liability of special classes of income received by non-residents.                                  | 48   |

| <div> <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> </div> |           |                    |   |      |
|--|-----------|--------------------|---|------|
| Country  | Status    | Latest development | Brief description   | Cite |
| Mexico   | ✓ Enacted | January 18, 2024   | <p>Intermediaries of digital services that process payments, should withhold tax to Mexican individuals from the income they obtained through the platform. The rate will depend on the activity performed:</p> <ul style="list-style-type: none"> <li>• Ground transportation services of passengers and delivery of goods: 2.1 percent.</li> <li>• Accommodation services: 4 percent.</li> <li>• Sales of goods and services: 1 percent.</li> </ul> <p>Service providers are required to be registered in Mexico as WHT agents. The digital platforms will be responsible for the withholding tax and will be required to file a declaration no later than the 17th of the month immediately following the month for which the tax was withheld with respect to goods or services digital transactions. Moreover, whenever intermediaries collect the consideration of the service, they must issue to each Mexican individual to whom the withholding was made a digital tax receipt of withholdings and payment information at the latest within five days following the month in which the withholding was made.</p>   | 49   |
|  |           |                    | <p>On July 14, 2020, the tax administration published guidance, including rules for remitting withholding tax by foreign providers of digital services in Mexico:</p> <ul style="list-style-type: none"> <li>• The digital services providers may remit the amounts of withholding tax in Mexican pesos, routed through financial institutions that have been authorized by Mexico's Treasury.</li> <li>• Alternatively, the digital services providers can elect to remit the tax payments from abroad, if they follow the requirements for a single occasion remittance in accordance with the procedure established on tax form 13 / PLT (known in English as the "Notice of option for the payment of contributions from abroad, for the provision of digital services in Mexico") as contained in Annex 1-A. They may make the related tax payment using either Mexican pesos or U.S. dollars. In both cases, the digital services providers must activate the appropriate field on the SAT website and make the payment.</li> </ul> <p>Mexico has published in the Official Gazette the Decree on amendments to the Income Tax Law, the Value Added Tax Law, and the Federal Tax Code, which provides for the implementation of the tax measures of the Economic Package for 2021. Among other measures, new withholding tax rates have been introduced on the total income of individuals actually received from</p> |      |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country     | Status     | Latest development | Brief description  | Cite |
|-------------|------------|--------------------|--|------|
|             |            |                    | <p>selling goods or providing services via the internet, technological platforms, computer applications, and the like, which is considering a provisional payment. The Miscellaneous Tax Resolution for 2021, as published in the Official Gazette on December 29, 2020 and effective January 1, 2021, includes new rules for individuals with business activities of selling goods or providing services through the internet via technological platforms. Regarding income received directly from purchasers of the goods or services, these individuals (if considering the tax paid as a “definitive” payment) must determine their taxable profit, calculate their income tax, and credit the tax withheld by the technological platforms and make the advanced income tax payment by submitting a return (known in English as the “Income tax payment of individuals in technological platforms return”).</p> <p>On January 18, 2024, the tax administration published a list of the 201 foreign providers of digital services that are registered for tax purposes in Mexico as of December 31, 2023.</p> |      |
| Nepal       | ✓ Enacted  | July 12, 2024      | <p>Effective July 17, 2022, Nepal imposes a 2 percent DST digital services provided to consumers (B2C) in Nepal if the related revenue exceeds NPR 2 million. The definition of digital services in scope of the DST is aligned with the new VAT rules on non-resident digital services providers.</p> <p>Effective July 16, 2024, Nepal increased the DST registration threshold from NPR 2 million to NPR 3 million.</p>   | 50   |
|             | ✓ Enacted  | July 12, 2024      | <p>Effective July 16, 2024, Nepal expanded the definition of permanent establishment to include non-residents that have a significant digital presence in Nepal, which has yet to be further defined.</p>  | 51   |
| Netherlands | ● Proposed | March 25, 2022     | <p>In March 2022, a bill was presented to the Lower House of the Parliament introducing a reporting obligation for digital platform operators to provide the Dutch tax authorities with information about certain users (“sellers”) on their platform in accordance with EU Directive 2021/514 “DAC7”.</p> <p>The obligation to collect, verify and report information applies to both EU and non-EU platform operators. The reporting obligation applies to both cross-border relevant activities and domestic activities. Non-EU platform operators are digital platforms that are not residents of an EU Member State, but the sellers using the platform do, however, have an EU nexus (i.e., the sellers are residents of an EU Member State or rent immovable property that is located in an EU Member State).</p> <p>The reporting platform operators falling under the reporting obligation must provide the information to the tax authorities no later than January 31 of the</p>  | 52   |

✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country            | Status   | Latest development | Brief description   | Cite |
|--------------------|--|--------------------|---|------|
|                    |  |                    | year following the reporting period (i.e., the calendar year covered by the report). The reporting obligation applies for the first time as of January 1, 2023, with a first reporting deadline of January 31, 2024. However, sellers that were already registered on January 1, 2023, the deadline for complying with the collection and verification requirements has been extended until December 31, 2024.  |      |
|                    | <span style="color: red;">✗</span> Waiting for Global Solution | October 24, 2023   | On October 24, 2023, the Dutch State Secretary wrote to the Dutch Parliament saying that a EU DST should be considered as an alternative to the OECD's Pillar one Amount A, if a global agreement is unlikely to be signed by the end of 2023.  | 53   |
| <b>New Zealand</b> | <span style="color: red;">✗</span> Waiting for Global Solution | May 20, 2025       | <p><b>State of Play</b></p> <p>On May 20, 2025, Revenue Minister Simon Watts announced that the government has removed the Digital Services Tax Bill from its legislative program, restating the Country's support of OECD work to address the tax challenges of the digital economy.</p> <p><b>Background</b></p> <p>On September 9, 2020, New Zealand's Labour Party published a document which includes a statement that New Zealand could follow other countries that have already announced that they will introduce digital services taxes, if negotiations at the OECD level don't reach an agreement.</p> <p>However, on November 19, 2021, New Zealand Inland Revenue indicated that the government's preference continues to be an OECD-led multilateral solution rather than a proliferation of DSTs, although the government is seriously considering implementing a DST in the event the OECD project fails to reach agreement within a reasonable timeframe.</p> <p>On May 18, 2023, New Zealand released a report detailing the country's 2023 budget. In the report, it was indicated that New Zealand is prepared to apply its own unilateral DST if Pillar One fails to go into effect globally by 2024.</p> <p>On August 31, 2023, the New Zealand government introduced a Digital Services Tax Bill into the parliament. If enacted, the bill would introduce a 3% DST on specified digital services and would be effective from January 1, 2025. The DST would apply to multinational digital services groups that earn at least EUR 750 million per year from global digital services and at least NZD 3.5 million per year from digital services provided to New Zealand users or connected to New Zealand. Covered digital services include intermediation platforms, social media and content sharing platforms,</p> | 54   |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
|         |           |                    | internet search engines, digital advertising, and activities related to user-generated data. The bill also provides that the implementation date may be extended for up to 5 years if the New Zealand government is satisfied with the progress of OECD's Pillar One multilateral solution.  |      |
| Nigeria | ✓ Enacted | July 25, 2022      | <p>The Finance Bill for 2020, which introduced the principle of significant economic presence (SEP) to the basis of taxation of non-resident companies operating in the digital services and e-commerce sectors, was signed into law. On May 29, 2020, the Nigerian Finance Ministry published a legislative order, retroactively applicable from February 3, 2020, defining and implementing the SEP concept. According to the order, a non-resident company will have an SEP in Nigeria in any accounting year if it has gross turnover or income of more than NGN 25 million (\$64,601) from four types of digital activities:</p> <ol style="list-style-type: none"> <li>1. providing streaming or downloading services of digital content, such as movies, music, games, and e-books to persons in Nigeria;</li> <li>2. transmitting data collected on Nigerian user activities on a digital interface, such as websites or apps;</li> <li>3. providing goods and services directly or indirectly through a digital platform; or</li> <li>4. providing intermediary services via a digital platform, website, or app linking suppliers to customers in the Nigerian market.</li> </ol> <p>A foreign company will also have an SEP if it uses a Nigerian domain name or has a URL registered in Nigeria, or if it has a "purposeful and sustained interaction with persons in Nigeria by customizing its digital page or platform" for the Nigerian market. Customization includes providing prices for products or services in Nigerian currency or offering payment or billing options in Nigerian currency.</p> <p>Based on international norms, the provisions of a Tax Treaty supersede local tax laws. Hence the Order, being an extension of Companies Income Tax Act, should not apply to companies based in countries with which Nigeria has a Tax Treaty.</p> <p>The FIRS released Circular n. 2022/12 to provide guidance on the taxation of non-resident individuals and companies. Specifically, among other things, it clarifies that the FIRS is empowered to assess the income derived from Nigeria by digital service companies at a "fair and reasonable percentage," where the income is below the expectation of the FIRS. The Circular further outlines the methods through which the FIRS may arrive at a fair and</p> | 55   |

| <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> |             |                    |   |      |
|---|-------------|--------------------|---|------|
| Country   | Status      | Latest development | Brief description   | Cite |
|   |             |                    | reasonable percentage for its tax assessment, including profit margins determined by information in the non-resident companies' individual and group financial statements, a percentage adopted in line with Government policy, and any other basis that the FIRS may consider fair and reasonable.   |      |
|   | ✓ Enacted   | September 10, 2024 | Effective September 9, 2024, the Nigeria is enforcing an electronic money transfer levy (EMTL) of NGN 50 on any electronic receipt or transfer of NGN 10,000 and above received by customers of any bank. Financial institutions, fintech companies, and online banking institutions in Nigeria are now required to comply with this regulation and must remit the collected levy by the business day following the transfer.   | 56   |
| Norway  | ● Announced | January 13, 2020   | The Norwegian Finance Ministry announced that Norway will introduce a unilateral measure if the OECD does not reach a consensus solution in 2020.   | 57   |
| OECD  | ● Announced | April 1, 2024      | <p>On October 12, 2020, the OECD released the Blueprints on Pillar 1 and Pillar 2, which reflect efforts for reaching a multilateral, consensus-based solution to the tax challenges arising from the digitalization of the economy, and other tax deliverables.</p> <ul style="list-style-type: none"> <li>The OECD report of the Pillar 1 Blueprint reflects a focus on new nexus and profit allocation rules so that, in an increasingly digital age, the allocation of taxing rights with respect to business profits is no longer exclusively circumscribed by reference to physical presence.</li> <li>The OECD report of the Pillar 2 Blueprint reflects an approach that is focused on the remaining BEPS challenges and proposes a systematic solution designed so that all internationally operating businesses pay a minimum level of tax. Pillar 2 leaves jurisdictions free to determine their own tax system, including whether they have a corporate income tax and where they set their tax rates, but also considers the right of other jurisdictions to apply the rules contained in this report where income is taxed at an effective rate below a minimum rate.</li> </ul> <p>A new economic impact analysis was also released, which shows the combined effect of the two-pillar solution under discussion.</p> <p>The ongoing work was presented in a new OECD Secretary-General Tax Report and discussed during the next meeting of G20 Finance Ministers and Central Bank Governors, under the Saudi Arabian Presidency, on October 14, 2020.</p> | 58   |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description   | Cite |
|---------|--------|--------------------|---|------|
|         |        |                    | <p>On January 14 and 15, 2021 the OECD held the virtual public consultation on the comments received on the Reports on the Pillar 1 and Pillar 2 Blueprints.</p> <p>On March 4, 2021, during the Tax Talk webcast, members of the OECD Secretariat provided updates on the OECD's international tax work. On BEPS 2.0, the speakers summarized the state of play on the two-pillar approach. The speakers referred to the OECD Secretary-General Report to G20 Finance Ministers and Central Bank Governors and noted the letter sent by US Treasury Secretary Yellen. They also described the aim of reaching agreement during an Inclusive Framework meeting that will take place shortly before the G20 meeting to be held on July 9, 2021. In addition, they noted that the BEPS 2.0 project will be discussed during the G20 Finance Ministers meeting, held on April 7, 2021.</p> <p>On June 22, 2021, the OECD released the "Model Reporting rules for digital platforms - International Exchange Framework and Optional Module for Sale of Goods", which expands the model rules released in July 2020 to include digital platforms that sell goods online and rent transportation and allows tax authorities to automatically exchange information on goods sold and car rented.</p> <p>On October 8, 2021, the OECD announced that 136 jurisdiction joined the "Statement on the Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalisation of the Economy", which updates and finalizes a July political agreement by members of the Inclusive Framework to fundamentally reform international tax rules.</p> <p>On December 20, 2021, the OECD published detailed Pillar 2 model rules. The rules define the scope and set out the mechanism for the so-called Global Anti-Base Erosion (GloBE) rules under Pillar 2, which will introduce a global minimum corporate tax rate set at 15 percent. The minimum tax will apply to MNEs with revenue above EUR 750 million.</p> <p>In February and April 2022, the OECD invited public input on draft model rules for nexus and revenue sourcing and tax base determination under Amount A of Pillar 1, as well as on an exclusion for the extractives industry.</p> <p>In a July 10-12, 2023 meeting, 138 members of the OECD's Inclusive Framework agreed to extend the moratorium on imposing new DSTs or other similar, unilateral measures either until December 31, 2024, or until entry into force of the Multilateral Convention for Pillar 1, Amount A. The moratorium's extension requires that a minimum of 30 jurisdictions</p> |      |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country  | Status    | Latest development | Brief description  | Cite |
|----------|-----------|--------------------|--|------|
|          |           |                    | <p>representing at least 60 percent of ultimate parent entities of MNEs in scope of Pillar One Amount A sign the agreed rules before the end of 2023.</p> <p>On October 11, 2023, the OECD published the text of the Multilateral Convention for Pillar 1, Amount A, along with supplementary documents. It also released Working Paper No. 66, which describes the changes that Amount A has undergone, updates the data and methodology of the impact assessment, and illustrates the impact Amount A will have on the allocation of taxing rights.</p> <p>On December 18, 2023, the OECD released a statement regarding the timeline for the Multilateral Convention for Pillar 1. The statement recognizes ongoing efforts to resolve differences, especially concerning the standstill on new Digital Service Taxes, and expresses commitment to a consensus-based solution. The Inclusive Framework plans to finalize the Multilateral Convention text by March 2024, with a signing ceremony scheduled for June 2024. However, in April 2024, the OECD announced that the finalization of the Multilateral Convention for Pillar 1 text has been delayed.</p> |      |
| Pakistan | ✓ Enacted | May 24, 2018       | Effective July 1, 2018, Pakistan introduced a 5 percent withholding tax on certain payments for offshore digital services like online advertising, designing, creating, hosting or maintenance of websites, providing any facility or service for uploading, storing or distribution of digital content, online collection or processing of data related to users in Pakistan, any facility for online sale of goods or services, or any other online facility.  | 59   |
|          | ✓ Enacted | June 26, 2023      | On June 26, 2023, Pakistan enacted its Finance Act 2023. The Act includes measures to remove the word 'fixed' from the definition of 'Permanent Establishment'(PE) in its income tax law. For this purpose, the Act introduces a new clause for 'virtual business presence' in Pakistan. This is defined to include any business where transactions are conducted through the internet or any other electronic medium, with or without having a physician presence.  | 60   |
|          | ✓ Enacted | July 3, 2024       | On June 29, 2024, Pakistan published the Finance Act 2024, clarifying, among other things, that the business income of a non-resident is considered as income sourced from Pakistan if it is directly or indirectly linked to "any business connection" within the country. The term "any business connection" now encompasses the "significant economic presence in Pakistan" of a non-resident. This includes transactions involving any goods, services, or property conducted by a non-resident with any person in   | 61   |



✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country  | Status    | Latest development | Brief description   | Cite |
|----------|-----------|--------------------|---|------|
|          |           |                    | Pakistan if the gross receipts from such transactions exceeds an amount that has yet to be prescribed. It also covers the downloading of data or software in Pakistan, as well as the systematic and continuous solicitation of business activities or digital interactions with users in Pakistan.   |      |
| Paraguay | ✓ Enacted | April 6, 2022      | <p>The Law 6380/2019, which reformed the Paraguayan tax system as of January 1, 2020, includes provisions on the taxation of digital services, defined as services available to users through the internet or any adaptation or application of the protocols, platforms or technology used by the internet or any other network through which services are provided online access and are characterized by being essentially automatic and not viable in the absence of information technology, including call / contact center, BPO process and similar. A 15 percent Non-Resident Tax (INR) shall be applied to taxable income (net of VAT) derived from the provision of digital services by a foreign supplier. Banks and financial entities, cooperatives, payment processing entities and telephone companies must act as withholding agents, when the service user pays for it with credit or debit card, or by transfers. The obligation to withhold taxes will be in force starting on July 1, 2020.</p> <p>However, on June 5, 2020, due to the current COVID-19 situation, the government has postponed until January 1, 2021 the entry into force of the withholding mechanism.</p> <p>Paraguay published General Resolution No. 76-20, which provides for the implementation of the INR withholding on digital services with effect from January 1, 2021. The General Resolution also specifies the types of digital services affected as follows:</p> <ul style="list-style-type: none"> <li>• Digital distribution of multimedia content (games, movies, music, videos, among others);</li> <li>• Data processing and storage in general, and the provision, development, or updating of software or applications in general;</li> <li>• Cable and satellite television;</li> <li>• Marketing and advertising;</li> <li>• Games of luck, chance, bets and the like; and</li> <li>• Educational services provided through technological platforms.</li> </ul> | 62   |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>The list may be updated, in which case it will be published on the website <a href="http://www.set.gov.py">www.set.gov.py</a>.</p> <p>Lastly, special rules are provided with respect to digital intermediation services for land transport. This includes that instead of withholding on related payments, a non-resident provider of the intermediation services must register with the tax administration within 10 business days of beginning activities in Paraguay, with monthly declaration and payment requirements.</p> <p>On May 31, 2021, Decree n. 5373 further deferred to January 1, 2022 the implementation of the INR withholding by intermediaries including banks, financial entities, exchange houses, payment processors, and similar entities, and other entities that mediate in payments for digital services from foreign suppliers. This deferral applies where the user of the services uses a credit or debit card as a means of payment.</p> <p>The decree also provides that certain taxpayers (generally legal persons, such as companies, partnerships, associations, etc.) are required to withhold INR when acquiring digital services from foreign suppliers, regardless of the payment method.</p> <p>General Resolution n.109/2021 established a simplified mechanism for the registration for INR purposes of non-residents providing digital service supplies to final consumers in Paraguay. Non-resident digital service providers are required to register through a non-resident registration form to be submitted within 10 business days after the start of the provision of services. The Resolution also prescribes the INR withholding and payment requirements for digital services and clarifies that the simplified mechanism is only available where digital services are provided to consumers in Paraguay.</p> <p>On March 24, 2022, General Resolution n. 114/2022 was released, repealing General Resolution n.109/2021. Although the general requirements did not change, the new resolution introduced several changes to the operating provisions. Specifically, new provisions provide that non-resident providers without local representation must register directly with some adjustments in the required documentation that must be submitted. The payment provisions are also adjusted to provide that a non-resident provider or, their agent or legal representative, is required to pay the corresponding tax due. It is also clarified that declarations (returns) and payments are due by the 15th of the month following the reporting month, with penalties imposed for late returns/payments.</p> |      |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country     | Status     | Latest development | Brief description  | Cite |
|-------------|------------|--------------------|--|------|
| Philippines | ● Proposed | April 20, 2023     | <p>The Philippine Bureau of Internal Revenue (BIR) announced that it will propose new Regulation n. 2-98 to impose a creditable 1% WHT on one-half of the gross income payments (remittances) made by online platform providers to suppliers of goods and services selling through a platform. Comments on the draft were due May 2, 2023.</p> <p>With the significant increase of online sales transactions, the BIR has recognized the difficulty in monitoring the income generated by online sellers (especially individuals) which use online platforms. Thus, the proposed amendment of RR No. 2-98 aims to make online platform providers act as withholding agents on the income earned by their partner online sellers/merchants and encourage tax compliance so that the tax withheld by the online platform providers may then be credited against the income tax due of their partner online sellers/merchants. Currently there is no mention as to whether non-resident online platform providers are covered by the proposal. However, this may be unlikely because under Philippine tax rules, non-residents are not authorized to act as withholding agents for income payments made to local suppliers.</p> |      |
| Poland      | ✓ Enacted  | June 25, 2020      | <p>Effective July 1, 2020, a new tax/fee on video on demand providers (VOD) is imposed. A 1.5 percent tax is calculated on gross revenue of the VOD provider resulting from access to audio-visual media service and audio-visual commercial communication.</p> <p>The tax shall be paid on a quarterly basis to the Polish Film Institute within 30 days following the end of each quarter, as a compensation for the reduction of revenues caused by COVID crisis. The payments are considered tax deductible.</p>   | 63   |
|             | ● Proposed | August 20, 2025    | <p>On August 13, 2025, Poland's Ministry of Digital Affairs met with industry and non-governmental organizations representatives to discuss a proposed digital services tax (DST) targeting multinational digital companies with global revenues exceeding EUR 750 million. Two models are under consideration: a broad variant with a tax rate of three, 4.5, or 6 percent on digital interfaces, targeted advertising, and user data transmission; and a narrow variant with a rate of 5, 6, or 7.5 percent focused solely on targeted advertising. Exemptions would apply to digital content delivery, payment, and communication services, regulated financial services, and direct sales.</p>   | 64   |
| Portugal    | ✓ Enacted  | February 2, 2020   | <p>On November 19, 2020, the Portuguese government published Law n. 74/2020 which introduces changes to the levies on cinematographic and audiovisual activities as follows:</p>   | 65   |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status              | Latest development | Brief description   | Cite |
|---------|---------------------|--------------------|---|------|
|         |                     |                    | <ol style="list-style-type: none"> <li>1. Exhibition levy of 4 percent on the price paid for audio-visual commercial communication included in video-sharing platforms – the law extends the application of the exhibition levy to audio-visual commercial communication, included in video-sharing platforms. The 4 percent exhibition levy is due by advertisers on income realized in Portugal and shall be included in the invoice issued by the video-sharing platform, who has the responsibility to make its payment. The exhibition levy must also be included in the taxable amount for VAT purposes.</li> <li>2. Annual levy of 1 percent on income of providers of subscription video-on-demand services - the law introduces a 1 percent levy that will be due by service providers on relevant income realized in Portugal associated with subscriptions or occasional transactions for video-on-demand services. Certain applicability thresholds are provided for service providers with low turnover (less than EUR 200,000 of annual relevant income) or with low audience (less than 0.5 percent of active subscribers).</li> </ol> <p>The Law entered into force 90 days after the date it was published, i.e., on February 17, 2021. However, it is not yet applicable pending regulations which shall address assessment, collection and payment rules on the audiovisual industry levies.</p> |      |
| Romania | ● Announced         | May 23, 2018       | The Official Gazette published a decision approving the EU Commission proposals on the corporate taxation of a significant digital presence (corporate taxation of a significant digital presence and digital services tax on revenues resulting from provision of certain digital services) and stating that both proposals comply with the principles of subsidiarity and proportionality. However, no further steps have been taken to implement the proposals.  | 66   |
| Russia  | ✗ Proposal rejected | October 10, 2022   | The Russian government has announced the approval of a plan (roadmap) for a second package of measures to support the IT industry. One of the key items in the plan is the development of a proposal for amendments to the Tax Code that would provide for the taxation of incomes received by foreign companies from providing digital services to Russian citizens or using data from Russian citizens, which is to take into account approaches discussed at the OECD. The plan also includes amendments to create a "digital residence" system for foreign companies and individuals operating in the IT  | 67   |

✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country      | Status   | Latest development | Brief description  | Cite |
|--------------|--|--------------------|--|------|
|              |  |                    | field, without the need for a physical presence in Russia. Proposals for both measures are to be completed by November 2021.   |      |
| Rwanda       | <span style="color: green;">✓</span> Enacted                   | June 5, 2025       | Effective May 29, 2025, Rwanda enacted a new Digital Services Tax (DST). The DST applies to revenues from digital services provided by non-resident entities to Rwandan users. Companies supplying digital services in Rwanda with a substantial national presence will pay a tax of 1.5 percent on their gross revenues sourced in Rwanda. An order from the tax authority will determine the scope of taxable digital services, substantial national presence, registration, declaration and payment modalities, and other relevant criteria.  | 68   |
| Sierra Leone | <span style="color: green;">✓</span> Enacted                   | January 1, 2024    | <p>Sierra Leone has introduced a new 1.5 percent DST on the turnover of all digital and electronic transactions. The government also intends to tax digital services further by introducing a withholding tax on fees paid to contractors providing these services.</p> <p>Effective January 1, 2024, Sierra Leone expanded the scope of the DST to also apply to non-residents. The regime applies to income derived from the following digital services:</p> <ul style="list-style-type: none"> <li>digital products, including subscription- based, downloadable and stream-able digital contents- satellite TVs, movies, music, apps, games, and e-books; software programs.</li> <li>services such as management and technical advisory, architectural or legal services.</li> <li>electronic data management, including transmission or collection of data about users in Sierra Leone.</li> <li>sale of goods or services directly, including online tickets and other services intermediating suppliers and customers through a digital platform.</li> <li>purchases via non-resident marketplaces or payment aggregators.</li> <li>digital gambling and betting activities.</li> <li>search engines and automated help desk services, e-learning platforms, audio, vision or digital media, transport hailing platforms, among others.</li> </ul> | 69   |
| Singapore    | <span style="color: red;">✗</span> Waiting for Global Solution | December 7, 2020   | According to a speech on the taxation of the digital economy by the Senior Minister of State for Law and Finance, Singapore advocates three high-level   | 70   |

✓ Enacted

● Proposed/Announced

✗ Proposal rejected/Waiting for Global Solution

| Country      | Status                        | Latest development | Brief description  | Cite |
|--------------|-------------------------------|--------------------|--|------|
|              |                               |                    | <p>principles: i) tax certainty for businesses; ii) tax neutrality between traditional and digital business models; and iii) international consensus on issues relating to the taxation of the digital economy.</p> <p>The Inland Revenue Authority has clarified the tax treatment based on existing provisions of the Income Tax Act (ITA) of the following taxes imposed by foreign jurisdictions on digital transactions for persons subject to tax in Singapore:</p> <ul style="list-style-type: none"> <li>taxes imposed as income tax are not deductible under section 15(1)(g) of the ITA; and</li> <li>taxes imposed as turnover tax, such as India's equalization levy and the UK's DST, are generally deductible under section 14(1) of the ITA.</li> </ul> |      |
| Slovakia     | ✓ Enacted                     | March 16, 2018     | As of January 1, 2018, digital platforms facilitating transport and lodging services in Slovakia, acting as a marketplace for such services in Slovakia, must register a PE. In certain cases, when a non-resident taxpayer does not register for income tax in the Slovak Republic, Slovak sourced income of such non-resident is subject to a withholding tax at the rate of 19 percent (or 35 percent for non-residents in a non-contracting state, i.e., a state which is not included in the "white list" published by the Ministry of Finance).  | 71   |
|              | ● Announced                   | August 18, 2025    | On August 18, 2025, Slovakia's Ministry of Investments proposed introducing a digital services tax (DST) that would remain in effect until a multilateral agreement under Pillar One of the OECD's global tax framework is reached.  | 72   |
| Slovenia     | ● Announced                   | February 24, 2020  | The Slovenian Ministry of Finance announced in June 2019 a government proposal to submit a draft bill to the National Assembly introducing a DST by April 1, 2020. The DST would comply with the EU directives and apply from September 1, 2020. However, since 2019 there has been no development in this respect and since the Prime Minister resigned in January 2020 it is rather unclear how this topic will develop in the future.   | 73   |
| South Africa | ✗ Waiting for Global Solution | August 26, 2020    | National Treasury and the South African Revenue Service (SARS) appeared in Parliament in June 2020 to discuss the issues within the digital economy and the implications for tax policy affecting the generation of new income tax revenue. During these discussions, National Treasury advised Parliament that South Africa has opted not to introduce any unilateral measures to deal with direct tax treatment of the challenges of the digital economy for now. South Africa has opted to wait for multilateral consensus  | 74   |

| <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> |           |                    |  |      |
|---|-----------|--------------------|--|------|
| Country   | Status    | Latest development | Brief description  | Cite |
|   |           |                    | or solutions to be published in the final report on tax challenges arising from digitalization which is due in 2020.   |      |
| Spain   | ✓ Enacted | March 28, 2023     | <p>Effective January 16, 2021, Spain introduced a 3 percent on digital services including online advertising, online intermediation services, and the sale of user data generated through a digital interface. The DST will be limited to companies with annual worldwide revenue exceeding EUR 750M and revenue from digital service activities in Spain exceeding EUR 3M. For companies that are part of a group, the thresholds will apply at the group level. The DST will be settled on a quarterly basis.</p> <p>Regulations providing for compliance requirements are expected to be released prior the effective date of the law.</p> <p>On December 3, 2020, a consultation was opened on a draft decree that would establish rules and methods to determine the place of digital service for tax purposes and the obligations for taxpayers to file and maintain tax records of specified digital services. Comments were due on December 16, 2020.</p> <p>On January 14, 2021, an article quoting sources knowing the Spanish Treasury was published in the Spanish national press, informing about a postponement of payment for the DST, which enters into force on January 16, 2021. The reason for the deferral is the lack of the definitive approval of the regulation for the taxation of digital services and the Form 420 (for self-assessment), for which draft legislation was published respectively on December 3 and on December 15, 2020. Therefore, this first settlement, initially expected to be due on April 30, 2021, could be extended until this summer. However, this postponement should not affect the total tax collection in 2021, inasmuch all expected tax payments would be due and collected during this year.</p> <p>On June 10, 2021, the tax authority released for public comments draft guidelines establishing a framework for practical application of the DST and covering topics such as how advertising and intermediation may be treated as a taxable event, non-taxation of digital services provided between related parties, and calculation of the tax base. The draft guidelines also address certain regularization processes as well as a penalty regime or interest for late payment. It is expected that additional clarifications will soon be issued in a set of FAQs.</p> <p>On June 11, 2021, the DST tax return Form 490 was finalized; it is available only in electronic format and must be submitted electronically. The return is to be filed quarterly, during the month following the end of the corresponding</p> | 75   |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country | Status                        | Latest development | Brief description  | Cite |
|---------|-------------------------------|--------------------|--|------|
|         |                               |                    | <p>quarter. However, the declaration for the first quarter of 2021 will be filed during the declaration period for the second quarter (i.e., from July 1, 2021 to August 2, 2021 or July 28 in case of direct debit). The return must be submitted even if there is no amount of tax owed.</p> <p>A new specific page of Form 490 (not provided in the draft) addresses regularization of provisional data, that is, information that is to be provided once the final amount is known. This procedure only refers to provisional data and this differs from the procedure established for amending incorrect data reported in a previous return.</p> <p>Effective from filing period beginning on July 1, 2022, a new Form 490 applies has been approved to determine the DST in Spain.</p> <p>During 2021 and 2022, the tax authority issued multiple binding resolutions as guidance intended to clarify the concept of intermediary through a digital interface and what constitutes a service subject to DST.</p> <p>Notably, effective January 1, 2023, following the enactment of the Foral Law 38/2022, the Community of Navarra is allowed to assess and collect any DST due since 2021, when the consumption of the digital services occurs within Navarra.</p> <p>On 28 March 2023, the Ministry of Finance amended tax form 490. The new tax form will apply to self-assessments of the first quarter of 2023, for which the filing period starts as from April 1, 2023.</p> |      |
|         | ✗ Repealed                    | August 23, 2024    | <p>On July 19, 2024, the High Court of Justice of Catalunya (Tribunal Superior de Justicia de Cataluña) issued decision 678/2023, declaring null and void the ordinance that imposed a 1.25 percent delivery fee on e-commerce companies. The Barcelona City Council had approved this fee on February 24, 2023, for delivery companies distributing goods purchased online with revenues over EUR 1 million. The taxpayer appealed against the ordinance, arguing that it contravened the free movement of goods, the digital single market, and the right to confidentiality of communications, and that it was discriminatory and contrary to the law regulating local taxation. The Tribunal Superior de Justicia de Cataluña agreed with the taxpayer, ruling that the fee was in fact a tax on income obtained by companies distributing goods purchased through electronic commerce, despite being termed as a "fee."</p>   | 76   |
| Sweden  | ✗ Waiting for Global Solution | June 1, 2018       | <p>The Finance Ministers of Denmark, Finland, and Sweden released a joint statement on digital tax, indicating that the digital economy, as well as the traditional economy, should be taxed where value is created. The statement</p>   | 77   |



✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country     | Status                               | Latest development          | Brief description  | Cite |
|-------------|--------------------------------------|-----------------------------|--|------|
|             |                                      |                             | continues that, any solution reached should be a consensus-based solution, with a substantial part done by the OECD. |      |
| Switzerland | <span style="color: red;">✗</span>   | Waiting for Global Solution | January 11, 2021   | 78   |
|             | <span style="color: green;">✓</span> | Enacted                     | February 9, 2023   | 79   |
| Taiwan      | <span style="color: green;">✓</span> | Enacted                     | July 24, 2019  | 80   |
| Tanzania    | <span style="color: green;">✓</span> | Enacted                     | June 26, 2023  | 81   |

✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country  | Status                                       | Latest development | Brief description  | Cite |
|----------|--|--------------------|--|------|
|          |  |                    | <p>events including broadcast television, will now be subject to taxation in Tanzania.</p> <p>In addition, digital services payments made by individuals to non-resident persons are now taxed a rate of 2 percent on the amount (excluding applicable VAT). The DST will be payable by monthly installment and a monthly return is also required to be filed to the Tax Authority on or before 7th day of the subsequent month.</p> <p>On June 26, 2023, Tanzania enacted its Finance Act 2023 into law. The law amends the scope of the DST to align it with the VAT scope. Thus, the DST now applies to electronic services and not just “service rendered through a digital marketplace”. The law also changes the due date for the monthly payment of the DST from the 7<sup>th</sup> to the 20<sup>th</sup>. The law became effective on July 1, 2023.</p> |      |
|          | <span style="color: green;">✓</span> Enacted | July 1, 2024       | <p>Effective July 1, 2024, Tanzania's Finance Act 2024 requires non-resident digital platforms that make payments to resident digital content creators to withhold income tax. The withholding tax is 5% for payments to digital content creators and 3% for payments related to digital assets. Digital content includes e-books, music, movies, software, and more, provided it's not broadcast over conventional radio or TV networks. A digital content creator is someone who produces such content for sharing over the internet. Digital assets refer to intangible items of value, such as cryptocurrencies and non-fungible tokens. The term “payment” refers to the gross fair market value received or receivable when a digital asset is exchanged or transferred.</p>   | 82   |
| Thailand | <span style="color: blue;">●</span> Proposed | May 7, 2019        | <p>The Thai government has proposed a 5 percent withholding mechanism for the taxation of e-commerce supplies of goods and services in the country, including online advertising, gaming, shopping, and others. The financial institution facilitating the transaction would be responsible to withhold and remit the tax.</p>   | 83   |
| Tunisia  | <span style="color: green;">✓</span> Enacted | April 1, 2022      | <p>Effective January 1, 2020, a 3 percent digital tax applies on the sale of digital applications and services by non-resident companies. While the law has been enacted, the implementing regulations is still pending.</p>   | 84   |
|          | <span style="color: green;">✓</span> Enacted | March 25, 2025     | <p>In March 2025, Tunisia clarified new tax obligations for online sellers and delivery services. Key measures include a 3 percent withholding tax on payments made by delivery service providers to online sellers or audiovisual broadcasters, applicable if the seller fails to provide a tax identification number. This applies to all transactions, regardless of their amount. Delivery service providers must also submit a monthly declaration detailing the</p>  | 85   |

✓ *Enacted*
● *Proposed/Announced*
✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
|         |           |                    | withheld amounts, report these amounts in the annual tax return, and provide the full identity of beneficiaries in their tax filings. Non-compliance penalties include a tax fine equivalent to the non-deducted amount, doubling for repeat offenses within two years, and criminal tax penalties for failure to withhold and pay the required tax within six months of the due date.   |      |
| Türkiye | ✓ Enacted | February 6, 2019   | 15 percent withholding tax on digital advertising payments made as of January 1, 2019 to services providers and intermediaries. The Revenue Administration published Communiqué No. 17 which provides details on the scope of the withholding tax.   | 86   |
|         | ✓ Enacted | October 30, 2025   | On October 30, 2025, a draft bill was submitted to Türkiye's Grand National Assembly proposing an increase in the digital services tax rate for foreign digital service providers from 7.5 percent to 12.5 percent. The standard rate of 7.5 percent would continue to apply to domestic providers.<br><br>Effective March 1, 2020, Türkiye introduced a 7.5 percent DST on gross revenues derived from the provision and management of digital services, such as advertising, digital content on digital platforms, including software, applications, music, videos, video games, in-game applications, etc. However, revenue derived from digital services not exceeding TRY 20,000,000 in Türkiye and Euro 750M (or equivalent) worldwide would be exempt. Also, the president has authority to reduce the 7.5 percent rate downward to 1 percent or to increase the rate upward to 15 percent.   | 87   |
| Uganda  | ✓ Enacted | July 9, 2025       | On June 30, 2025, the President of Uganda signed several tax measures into law, including a proposal concerning the Digital Services Tax (DST). Uganda currently operates a dual DST regime: a 5 percent DST on B2C transactions and a 15 percent DST withholding tax on B2B transactions. As an anti-abuse measure, the legislation now extends the 15 percent withholding tax to transactions between related parties that may be artificially structured as B2C to benefit from the lower rate.<br><br>In April 2023, the Parliament has released the Tax Amendments Bills 2023 for public consultation. The bill would introduce a 5 percent DST on non-residents providing digital services in Uganda. On May 2, 2023, the Committee on Finance recommended the Parliament to reduce the rate to 2 percent. In-scope digital services include: <ul style="list-style-type: none"> <li>– online advertising services;</li> <li>– data services;</li> <li>– services delivered through an online marketplace or intermediation platform;</li> </ul> | 88   |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country | Status              | Latest development | Brief description   | Cite |
|---------|---------------------|--------------------|---|------|
|         |                     |                    | <ul style="list-style-type: none"> <li>– digital content services, including accessing and downloading of digital content;</li> <li>– online gaming services;</li> <li>– cloud computing services;</li> <li>– data warehousing;</li> <li>– other services delivered through a social media platform or an internet search engine.</li> </ul> <p>On July 12, 2023, Uganda approved the implementation of the proposed DST. The DST will become effective after the President's assent.</p> <p>On October 20, 2023, the Ugandan Revenue Authority issued a notice on the implementation of the 5 percent digital services tax (DST), effective from July 1, 2023. The notice provides that non-resident providers of relevant services must register via the Uganda Revenue Authority (URA) website. Taxpayers who are already registered for the VAT on digital services rules will be automatically registered for DST, possibly without notification, as their online compliance portal account may be updated to include a DST section.</p> |      |
| Ukraine | ● Proposed          | September 7, 2021  | <p>The Ukraine Parliament in June 2021 adopted draft legislation concerning amendments to the tax code of Ukraine regarding the development of the digital economy in Ukraine. The draft law provides for the taxation regime of companies that are registered with "Diia City," their investors, employees, and "engaged gig-specialists." Diia City is a special legal framework for the IT industry. Under the draft law, a resident of Diia City would pay an 18 percent corporate income tax on the pre-tax income financial result subject to tax adjustments, or may opt to pay (1) 9 percent corporate income tax on the profit distributions, and (2) 18 percent corporate income tax on the value of transfer pricing adjustments arising from controlled transactions and CFC income.</p>  | 89   |
|         | ✗ Proposal rejected | September 19, 2022 | <p>The Ukraine State Tax Service issued guidance on changes in the taxation of payments to non-residents for production/distribution of advertising in Ukraine. The guidance notes the repeal of the 20 percent tax on payments for advertising services at the payer's expense. However, on June 17, 2022, the State Tax Service clarified that, from January 1, 2022, income of a non-resident legal entity in the form of proceeds or other types of compensation received for advertising services provided to a Ukrainian resident (or</p>   |      |

| <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> |             |                    |   |      |
|---|-------------|--------------------|---|------|
| Country   | Status      | Latest development | Brief description   | Cite |
|   |             |                    | permanent establishment of another non-resident) is not regarded as income of a non-resident from Ukrainian sources.  |      |
|   | ● Proposed  | April 10, 2025     | The Ukrainian Cabinet of Ministers recently proposed legislation to implement the Multilateral Competent Authority Agreement on Automatic Exchange of Information on Income Derived Through Digital Platforms (DPI MCAA), introducing an income tax withholding requirement for digital platforms. The legislation would require digital platform operators to report tax information on sellers and income generated through their platforms starting from January 1, 2026. It applies to platforms that are tax residents, established, or have an effective place of management in Ukraine and certain platforms outside the DPI-MCAA member states. The legislation also stipulates that digital platforms must withhold and report income tax for Ukrainian individuals earning income through these platforms, potentially subject to a reduced 5 percent individual income tax and the regular 5 percent military tax under certain conditions.  | 90   |
| United Kingdom  | ✓ Enacted   | July 28, 2023      | <p>The Finance Bill 2020, which contains the DST legislation, received royal assent on July 22, 2020. The DST is retroactively effective from April 1, 2020. On August 5, 2020, HMRC has published updates to the DST Tax Manual, including a new section with information about how to submit the return, completing a self-assessment, a notification obligation and cross-border relief claims. The government is committed to repealing the DST when an appropriate international agreement is reached on the taxation of the digitalization of the economy, however the UK DST does not contain a hardwired sunset clause – rather, the legislation provides that the UK government will review the tax in 2025. The DST legislation provides for a 2 percent tax on the revenues of search engines, social media platforms and online marketplaces which derive value from UK users. These businesses are subject to the DST when the group's worldwide revenues from these digital activities are more than £500M and more than £25M of these revenues are derived from UK users. The Bill confirms that the due date of the tax is the day after nine months following the end of the accounting period (i.e., October 1, 2021, for calendar year-end taxpayers).</p> <p>The UK Treasury agreed to a recommendation to develop a contingency plan if the country's DST needs to be extended beyond 2025, and also noted that it will continue to monitor the tax until reallocation rules under Pillar 1 are implemented.</p> | 91   |
|   | ● Announced | November 14, 2023  | On March 3, 2021, HMRC published a policy paper based on the OECD's "Model Rules for Reporting by Platform Operators with respect to Sellers in the Sharing and Gig Economy." The document states the UK's intention to   | 92   |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country        | Status    | Latest development | Brief description  | Cite |
|----------------|-----------|--------------------|--|------|
|                |           |                    | <p>introduce certain reporting requirements for digital platforms, which may be required to disclose to HMRC the income derived by sellers of services on their platforms. HMRC will then exchange the information with the other participating tax authorities for the jurisdictions where the sellers are tax resident.</p> <p>On May 19, 2022, HMRC announced that reporting rules for digital platforms based on the OECD's Model Reporting Rules. New provisions were introduced as part of the Finance Act 2021 to enable the implementation of the model rules, requiring digital platforms to report information on the income of their sellers to HMRC. Draft regulations for the rules are expected in the in 2022 during the summer.</p> <p>On November 24, 2023, HMRC published regulations for the implementation of the reporting rules for digital platforms based on the OECD's Model Reporting Rules. The regime is effective from January 1, 2024.</p>   |      |
| United Nations | ✓ Enacted | August 16, 2024    | <p>In April 2022, the United Nations released the 2021 version of the United Nations Model Tax Conventions. One of the main features of the revision is the new Article 12B on Income from Automated Digital Services, together with its Commentary, which were adopted in April 2021.</p> <p>By way of a background, the U.N. Tax Committee released on August 5, 2020 a draft proposal for a new article 12B of the U.N. Model Convention tax treaty to address the taxation of automated digital services.</p> <p>Article 12B aims to introduce a small portion of formulary apportionment into the global system. The proposal would give source countries the right to tax cross-border payments for automated digital services via a withholding tax on gross income or an apportionment formula on net income.</p> <p>The automated digital services under within scope are:</p> <ul style="list-style-type: none"> <li>• Online advertising services;</li> <li>• Online intermediation platform services;</li> <li>• Social media services;</li> <li>• Digital content services;</li> <li>• Cloud computing services;</li> <li>• Sale or other alienation of user data;</li> </ul> | 93   |

| <div> <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> </div> |        |                    |  |      |
|--|--------|--------------------|--|------|
| Country  | Status | Latest development | Brief description  | Cite |
|  |        |                    | <ul style="list-style-type: none"> <li>Standardized online teaching services.</li> </ul> <p>The proposal then moved on to the subcommittee, where it was discussed. On September 1, 2020, U.N. tax committee members submitted a proposal arguing that payments for software should be included in the definition of royalties, citing the allocation of taxing rights to states where software use rights are purchased. The discussion draft proposal has been open for comments until October 2, 2020. The U.N. Committee of Experts on International Cooperation in Tax Matters considered the proposal and its comments at its October 20 to October 29 virtual session.</p> <p>On March 11, 2021, a U.N. the subcommittee published an update on its work on a new article 12B for the U.N. model tax convention.</p> <p>On April 20, 2021, the UN Committee of Experts on International Cooperation in Tax Matters agreed to the text of a new article 12B and commentary for the UN model tax treaty that would grant additional taxing rights to countries where an automated digital services provider's customers are located. Article 12B would allow a contracting state to tax gross automated digital services income earned by a beneficial owner that is resident in the other contracting state and has no local PE. Article 12B does not specify any quantitative or qualitative nexus thresholds and leaves specific tax rates to be negotiated bilaterally, but it does suggest a "modest rate" of 3 percent or 4 percent to address concerns about double or excessive taxation, according to the commentary.</p> <p>On November 22, 2023, the UN General Assembly passed a resolution to create an ad hoc committee of country representatives tasked with drafting the terms of reference for a binding framework convention on tax cooperation. The resolution follows expressions of discontent from some countries regarding the OECD's Pillar One and Pillar Two global tax deal.</p> <p>On March 15, 2024, the South Center, an intergovernmental organization that promotes the collective interests of developing countries, submitted comments to the UN. These comments laid out recommendations for a new framework convention at the United Nations, seeking protocols to address the taxation of digital services, among other taxes. This submission followed the UN General Assembly's vote in November to create a binding framework convention on international tax cooperation.</p> <p>On June 7, 2024, a UN committee released a preliminary document, outlining the framework for a global tax treaty. The document, highlighting developing countries' push for the UN to set global tax norms, proposes that a proposed treaty should include commitments on fair tax allocation,</p> |      |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country       | Status      | Latest development | Brief description  | Cite |
|---------------|-------------|--------------------|--|------|
|               |             |                    | <p>equitable taxation of multinational enterprises and high-net-worth individuals, environmental tax measures, transparency, information exchange, and effective tax dispute resolution.</p> <p>On August 16, 2024, the UN voted on a package of guidance for the framework of a global tax treaty.</p>  |      |
| United States | ● Announced | October 26, 2025   | <p><b>State of Play</b></p> <p>On October 26, 2025, the United States announced preliminary trade agreements with Cambodia, Malaysia, and Thailand that include provisions preventing the imposition of digital services taxes that would discriminate against U.S. companies.</p> <p>On August 25, 2025, the United States warned of new tariffs and export restrictions targeting countries that impose digital services taxes on US technology firms.</p> <p>On August 15, 2025, the Fourth Circuit Court of Appeals held that Maryland's "pass-through" provision, which prohibits companies subject to the state's digital advertising tax from separately stating the tax as a fee, surcharge, or line-item on customer invoices, violates the First Amendment. The court found that the law restricts protected speech by preventing businesses from communicating the impact of the tax to their customers, thereby insulating the state from political accountability for price increases. Maryland's justification, that the provision ensures companies bear economic and legal responsibility for the tax, was rejected, as the law does not actually prevent companies from passing on the cost through higher prices; it only restricts how that information is communicated. The court concluded that the provision is a content-based restriction on speech that cannot survive constitutional scrutiny, reversed the lower court's decision, and remanded for consideration of remedies.</p> <p>On May 22, 2025, the U.S. House of Representatives passed H.R. 1, the budget reconciliation bill known as the "One Big Beautiful Bill Act." Among other measures, the Bill includes retaliatory measures imposed on certain non-U.S. corporations and individuals if their home jurisdiction has adopted taxes deemed to be discriminatory or extraterritorial, including the undertaxed profits rule of Pillar Two, digital services taxes, diverted profits taxes, and potentially others. The bill will be transmitted to the Senate for consideration to begin after the Congressional Memorial Day recess. The Senate is expected to make changes to the House-approved bill, possibly including the tax provisions.</p> | 94   |



✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description   | Cite |
|---------|--------|--------------------|---|------|
|         |        |                    | <p>On March 31, 2025, the Office of the United States Trade Representative (USTR) published a report, identifying, among other things, electronic commerce and audiovisual trading barriers across the globe, including DSTs, significant economic presence standards, and streaming taxes.</p> <p>On March 28, 2025, Republican members of the House Ways and Means Committee yesterday reintroduced the “Unfair Tax Prevention Act,” which would increase the U.S. base erosion and anti-abuse tax (BEAT) where foreign countries adopt Pillar Two’s undertaxed profits rule (UTPR).</p> <p>Republican members of the Ways and Means Committee in May 2023, and again in January 2025, introduced another bill entitled the “Defending American Jobs and Investment Act” also intended to respond to the OECD Pillar Two initiative. That bill would impose a 5% addition to the tax rate each year for four years on the U.S income of individuals and entities located in a foreign jurisdiction that imposes a discriminatory or extraterritorial tax, such as a UTPR or digital services tax (DST). After four years, the cumulative 20% additional tax would be imposed each year the targeted tax remains in effect.</p> <p>On February 21, 2025, the White House issued an executive memorandum under President Donald Trump’s “America First” initiative, focusing on protecting U.S. technology companies from what is termed “overseas extortion.” The memorandum directs scrutiny and potential counteractions against foreign tax and regulatory measures, with foreign Digital Services Tax (DST) being a key concern. It tasks the United States Trade Representative (USTR) with exploring trade remedies under the United States-Mexico-Canada Agreement (USMCA) and instructs Treasury officials to assess whether foreign tax policies violate U.S. tax treaties or warrant countermeasures under Section 891 of the Internal Revenue Code. Additionally, the memorandum establishes a reporting mechanism for American businesses to inform the USTR of foreign practices that disproportionately impact U.S. companies.</p> <p><b>Background</b></p> <p>On July 22, 2020, the Office of the U.S. Trade Representative (USTR) announced that it has initiated investigations of digital services taxes that have been adopted or are being considered by certain trading partners of the United States. The investigations will be conducted under Section 301 of the 1974 Trade Act and will focus on digital services taxes that are viewed as discriminating against U.S. companies as adopted or under consideration by:</p> |      |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description   | Cite |
|---------|--------|--------------------|---|------|
|         |        |                    | <ul style="list-style-type: none"> <li>– Austria</li> <li>– Brazil</li> <li>– Czech Republic</li> <li>– European Union</li> <li>– India</li> <li>– Indonesia</li> <li>– Italy</li> <li>– Spain</li> <li>– Türkiye</li> <li>– United Kingdom</li> </ul> <p>A notice released by the USTR addresses findings of the Section 301 investigation of France's digital services tax launched in July 2019 and announces the imposition of additional customs duties of 25 percent on U.S. \$1.3 billion of French products imported into the United States. However, the additional customs duties are suspended for 180 days, until January 6, 2021.</p> <p>In January 2021, the USTR issued reports and findings from the Section 301 investigations of DSTs adopted by India, Italy, and Türkiye, Austria, Spain, and the United Kingdom. The USTR found that each of these DSTs discriminates against U.S. companies, is inconsistent with prevailing principles of international taxation, and burdens or restricts U.S. commerce and thus is actionable under Section 301. Still pending and expected are USTR reports of investigations of digital services taxes (under consideration) in Brazil, the Czech Republic, the EU, and Indonesia.</p> <p>On January 7, 2021, the USTR also announced the suspension of the additional custom duties that were announced in July 2020 in response to a Section 301 investigation of France's DST, and were scheduled to be effective January 6, 2021.</p> <p>On March 26, 2021, the USTR announced that six countries (Austria, India, Italy, Spain, Türkiye, and the United Kingdom) remain subject to potential action while broader international tax negotiations continue. The investigation for the remaining four jurisdictions (Brazil, the Czech Republic, the European Union, and Indonesia) is being terminated as those have not adopted / implemented the DSTs under consideration. If, however, any of</p> |      |

✓ Enacted
● Proposed/Announced
✗ Proposal rejected/Waiting for Global Solution

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>these jurisdictions proceeds to adopt or implement a digital services tax, the USTR indicated that it may initiate new investigations.</p> <p>On March 30, 2021, the USTR released for publication in the Federal Register six notices setting a hearing date and requesting comments regarding potential trade actions in connection with the Section 301 investigations of DSTs in Austria, India, Italy, Spain, the UK, and Türkiye. The USTR also will accept rebuttal comments in relation to the potential actions. Comments are due April 30, 2021, and rebuttal comments are due May 10, 2021.</p> <p>On March 31, 2021, the USTR issued six notices in connection with the Section 301 investigations of DSTs in Austria, India, Italy, Spain, the United Kingdom, and Türkiye, and announced that also will accept rebuttal comments in relation to the potential actions. Comments are due April 30, 2021, and rebuttal comments are due May 10, 2021. The public hearings will be held on May 3, 2021.</p> <p>On June 2, 2021, the USTR announced the conclusion of the one-year Section 301 investigations of DSTs adopted by Austria, India, Italy, Spain, Türkiye, and the United Kingdom. While the conclusion is to impose additional tariffs on certain goods from these countries, the United States is suspending the tariffs for up to 180 days to provide additional time to complete the ongoing multilateral negotiations on international taxation at the OECD and in the G20 process.</p> <p>On October 21, 2021, U.S. Treasury published a joint statement with Austria, France, Italy, Spain, and the United Kingdom dealing with existing DSTs before Pillar 1 is fully implemented. Under the agreement, the EU countries and the UK will give tax credits to U.S. companies with DST liabilities against their future income tax liabilities under Pillar 1 rules once they are enacted. In exchange, the USTR will drop plans to impose retaliatory 25 percent tariffs on U.S. imports of Austrian, French, Italian, Spanish, and U.K. goods.</p> <p>On November 22, 2021, the U.S. Treasury Department announced that the United States and Türkiye have reached an agreement on a transition from the existing Turkish DST to a new international tax framework (under the Two-Pillar solution of the OECD/G20 Inclusive Framework) to be implemented in 2023. According to Treasury release, the agreement represents “a pragmatic solution” and allows for the termination of U.S. trade measures adopted in response to the Turkish DST.</p> |      |

✓ *Enacted*

● *Proposed/Announced*

✗ *Proposal rejected/Waiting for Global Solution*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         |        |                    | <p>On November 24, 2021, the U.S. Treasury Department announced that the United States and India have reached an agreement on a transition from India's existing "equalization levy" to a new international tax framework to be implemented in 2023. The agreement allows for the United States to terminate U.S. trade measures adopted in response to the equalization levy.</p> <p>On December 15, 2021, the USTR issued a warning following Canada's proposed DST legislation. In particular, the USTR expressed concern about the unilateral and potentially retroactive nature of the proposed Canadian DST, and also noted that DSTs are generally designed to discriminate against U.S. firms. Further, the USTR warned that if Canada adopts the proposed DST legislation, the U.S. would explore all options available to it, including review of existing trade agreements. In a January 12 letter addressed to USTR, Senate Finance Committee Chair Ron Wyden and ranking member Mike Crapo said that Canada's plan to enact a 3 percent DST also has implications for its commitments made as part of the G-20 and the OECD's Inclusive Framework on BEPS. On February 22, 2022, the USTR submitted comments to the Canadian government expressing opposition to Canada's plan to enact a DST and urging Canada to abandon any plan for a unilateral measure.</p> <p>On March 1, 2023, The USTR announced that it will continue to monitor the imposition of DSTs by US trading partners and evaluate available options, including under trade agreements and domestic statutes, if other countries proceed with measures.</p> <p>On May 25, 2023, the Republican members of the House Ways &amp; Means Committee released proposed legislation that would impose new taxes on companies that are resident in countries that have enacted legislation implementing Pillar One or Pillar Two.</p> <p>On February 15, 2024, U.S. Treasury Department announced that in light of the revised timeline for adoption and signature of the Pillar One multilateral convention (MLC), Austria, France, Italy, Spain, and the United Kingdom have decided to extend from December 23, 2023, until June 30, 2024, the political agreement set forth in the joint statement issued on October 21, 2021, regarding their agreement that (as part of Pillar One) they will withdraw all unilateral measures concerning the imposition of DSTs once Pillar One takes effect.</p> <p>On March 12, 2024, the U.S. Treasury Department announced that in light of the revised timeline for adoption and signature of the Pillar One MLC, the United States and Türkiye have decided to extend from December 23, 2023, until June 30, 2024, the political agreement set forth in the joint statement</p> |      |

| <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> |           |                    |   |      |
|---|-----------|--------------------|---|------|
| Country   | Status    | Latest development | Brief description   | Cite |
|   |           |                    | <p>issued on October 21, 2021, regarding their agreement that they will withdraw all unilateral measures concerning the imposition of DSTs once Pillar One takes effect.</p> <p>On March 5, 2024, the US Congress Joint Committee on Taxation released a report analyzing Pillar 1 ahead of a hearing organized by the House Ways and Means Subcommittee, which was conducted on March 7, 2024. The report outlines three simulations estimating a potential revenue loss ranging from \$100 million to \$4.4 billion in US revenue under Pillar 1 Amount A.</p> <p>In March 2024, the US Treasury Department announced that it is negotiating the definition of DSTs with counterparts at the OECD. This comes after corporate taxpayers and members of the US Congress expressed concerns that the Pillar One MLC may not provide sufficient protection for businesses from all forms of digital taxes.</p>   |      |
| Uruguay   | ✓ Enacted | July 16, 2018      | <p>Effective from January 1, 2018, services related to businesses involved in the digital economy are now subject to income tax in Uruguay even if the services are provided from a foreign jurisdiction. Specifically, audio visual services (e.g., video, film and music streaming services) provided from abroad by electronic means to customers located in Uruguayan territory and mediation or intermediation services provided from abroad by electronic means (e.g., accommodation, transport, etc.) in which one or both parties is located in Uruguayan territory, are subject to a 12 percent non-resident income tax.</p>   | 95   |
| Vietnam   | ✓ Enacted | June 14, 2025      | <p>Effective July 1, 2020, payments made to non-resident or foreign suppliers without a permanent establishment in Vietnam carrying out e-commerce, digital-based business and other services with organizations and individuals in Vietnam are subject to tax in Vietnam at a rate that ranges between 0.1 percent – 10 percent depending on the type of business activity.</p> <p>Foreign suppliers without a permanent residence in Vietnam can register with tax authorities: an online portal for tax registration became available on March 21, 2022. If a foreign supplier fails to declare and pay tax, the commercial banks, credit institutions or payment service providers will be required to provide information to the tax authorities about the transactions involved.</p> <p>On June 14, 2025, Vietnam passed Law No. 67/2025/QH15, including measures expanding the definition of permanent establishment to cover digital platforms. Effective October 1, 2025, the definition now includes e-</p> | 96   |

| <span>✓ Enacted</span> <span>● Proposed/Announced</span> <span>✗ Proposal rejected/Waiting for Global Solution</span> |                        |                    |   |      |
|---|------------------------|--------------------|---|------|
| Country   | Status                 | Latest development | Brief description   | Cite |
|   |                        |                    | commerce and digital platforms through which foreign enterprises provide goods and services in Vietnam.   |      |
| Zimbabwe  | <span>✓</span> Enacted | January 1, 2019    | Effective from January 1, 2019, Zimbabwe has introduced new rules for the taxation of non-resident e-commerce platforms and satellite broadcasting service providers. Any amount receivable by or on behalf of an e-commerce platform/satellite broadcasting service provider domiciled outside Zimbabwe from persons resident in Zimbabwe shall be deemed to be income from a source within Zimbabwe and subject to tax at a rate of 5 percent if the revenue exceeds USD 500,000 per annum. | 97   |

## Citations – Direct taxes

- 1 Sarah Paez, "ATAF Recommends a DST Rate below 3 percent", Tax Notes International (October 2, 2020), and ATAF Communications, July 12, 2023; African Tax Administration Forum, ATAF Publishes Second Policy Brief for Taxation of Highly Digitalised Businesses in Africa, (April 12, 2024), News IBFD
- 2 Lucas de Lima Carvalho, "The Application of Argentina's New Solidarity Tax to Digital Services", Tax Notes International (March 9, 2020)
- 3 Orbitax, The Tax Hub, "Argentina Publishes Budget Law for 2021"
- 4 KPMG Tax News Flash, "Argentina: New digital services tax procedures for Buenos Aires" (April 14, 2021) and KPMG Tax News Flash, "Argentina: List of entities for digital services tax purposes, Buenos Aires" (April 14, 2021)
- 5 CCH, Australia Urged To Consider New Digital Platform Levy (October 29, 2024)
- 6 KPMG Tax News Flash, "Austria: Legislation introducing digital services tax" (October 29, 2019), Republic of Austria, Federal Ministry of Finance, Digital Tax Act 2020 Guidance, and KPMG Tax News Flash, "Austria: Update on digital services tax" (February 24, 2020)

- 7 KPMG Tax News Flash, " Belgium: Proposal for digital services tax" (July 15, 2020) and KPMG Tax News Flash, " Belgium: Tax plans of new coalition government include recovery measures (COVID-19)" (October 2, 2020); Belgium - Federal Coalition Agreement Plans Introducing Digital Service Tax, Horizontal Monitoring, Fiscal Arbitrage (February 3, 2025), News IBFD
- 8 Orbitax, The Tax Hub, "Draft Bill for Introduction of Digital Services Tax Submitted in Brazilian Parliament" and KPMG member firm in Brazil; KPMG Tax News Flash, "Brazil: Proposed contribution for digital content that targets children" (April 10, 2025); Brazil - Brazil Proposes 7% Digital Social Contribution for Big Tech Companies (August 20, 2025), News IBFD
- 9 Stephanie Soong Johnston "Digital Tax a 'Viable Idea' for Cambodia, Think Tank Says", Tax Notes International (January 13, 2021)
- 10 KPMG Tax News Flash, "Canada: Post-2019 election possible tax changes" (October 23, 2019), KPMG Tax News Flash, " Canada: Wage subsidy extended; future tax plans announced (COVID-19)" (September 24, 2020), Amanda Athanasiou, "Canada signals possible unilateral action on digital tax", Tax Notes International (December 2, 2020), KPMG Tax News Flash, " Canada: Digital services tax among measures in 2021 federal budget" (April 20, 2021), Stephanie Song Johnston and Andrew Velarde, "Treasury Closing In on Digital Tax Repeal Deals With Countries", Tax Notes International (October 18, 2021), KPMG Tax News Flash, "Canada: Digital services tax legislative proposal; other tax measures in 2021 fall economic update" (December 15, 2021), KPMG Tax News Flash, " Canada: Tax provisions in federal budget for 2022" (April 8, 2022) and KPMG Tax News Flash, " Canada: Tax provisions in federal budget for 2023" (March 29, 2023); Government of Canada, Statement by the Deputy Prime Minister on international tax reform negotiations, July 12, 2023; Government of Canada, Department of Finance, Legislative Proposals and Explanatory Notes Relating to Various Statutes, August 2023; KPMG Tax News Flash, " Canada: First reading of second 2023 federal budget bill includes EIFEL, hybrid mismatch, and DST rules" (December 4, 2023); Government of Canada, Budget 2024, April 16, 2024; Taxnotes, Canadian Parliament Approves Controversial Digital Services Tax, (June 21, 2024); KPMG Tax News Flash, "Canada: Digital services tax now in effect" (July 8, 2024); United States; Canada - United States Requests Dispute Settlement Consultations on Canada's Digital Service Tax (September 5, 2024), News IBFD; Canada; United States - Canada Drops Digital Services Tax Following Trump Ultimatum, Clearing Path for Renewed US Trade Deal (June 30, 2025), News IBFD
- 11 Canada - Canada to Impose 5% Streaming Tax, Business Associations Oppose Measure, (June 4, 2024), News IBFD
- 12 KPMG member firm in Chile
- 13 William Hoke, "China Should Consider a Digital Services Tax, Says Key Regulator", Tax Notes Today International (December 17, 2020)
- 14 KPMG Tax News Flash, "Colombia: Tax reform measures include 15% minimum tax, surcharges, digital services tax" (December 19, 2022); KPMG Tax News Flash, "Colombia: Proposed regulations on new significant economic presence rule enacted under 2022 Colombian tax reform" (July 13, 2023); KPMG Tax News Flash, Colombia: Final regulations on new significant economic presence rule, December 1, 2023
- 15 Colombia - Tax Authority Further Clarifies Significant Economic Presence Rules (October 3, 2024), News IBFD
- 16 KPMG Tax News Flash, "Costa Rica: Taxation and savings certificates, wire transfers, short-term rentals, other items" (November 25, 2019)
- 17 KPMG Tax News Flash, "Czech Republic: Digital services tax, update" (November 21, 2019), KPMG Tax News Flash, "Czech Republic: Bill proposing digital services tax presented to legislature" (December 11, 2019), Orbitax, The Tax Hub, "Final Draft Bill for Digital Services Tax Submitted in Czech Parliament", Orbitax, The Tax Hub, "Czech Republic Considering Delayed Introduction of DST and Reduced Rate", Stephanie Soong Johnston "Czech Ruling Coalition Agrees to Cut, Delay Proposed Digital Tax", Tax Notes Today International (June 11, 2020), KPMG Tax News Flash, "Czech Republic: Status of digital tax proposal" (October 9, 2020), KPMG Tax News Flash, "Czech Republic: Status of digital services tax legislation" (June 9, 2021), KPMG member firm in Czech Republic and Czech Republic - Czech Government Approves DAC7 Implementation (14 Apr. 2022), News IBFD
- 18 Sweden Ministry of Finance Statement, "Global cooperation is key to address tax challenges from digitalization" (June 1, 2018)
- 19 Denmark - Denmark Will Impose 6% Digital Streaming Services Levy (May 23, 2022), News IBFD and KPMG Member Firm in Denmark; CCH, Global Tax News, Denmark Agrees New Tax On Streaming Services
- 20 Servicio de Rentas Internas, "IMPUESTO A LA RENTA ÚNICO A LOS OPERADORES DE PRONÓSTICOS DEPORTIVOS," Servicio de Rentas Internas, Resolution No. NAC-DGERCGC24-00000029.
- 21 Egypt - 2020 draft budget – announced (25 Sep. 2019), News IBFD
- 22 KPMG Tax News Flash, "EU: Taxation of digital economy, public consultation launched" (January 19, 2021), Stephanie Soong Johnston, "EU Parliament Backs More Tax Cooperation on Digital Platforms", Tax Notes International (March 11, 2021), Euro Tax Flash, "Digital economy updates from the EU institutions" (March 29, 2021) Euro Tax



Flash, "European Commission communication on Business Taxation for the 21st century" (May 19, 2021), Elodie Lamer "European Commission Postpones Digital Levy Plans", Tax Notes Today International (July 13, 2021), and CCH Tracker News Global Daily Tax News, "EU To Table A Digital Tax Proposal In October," (Sep. 7, 2021); Bloomberg Tax, EU Digital Tax Could Raise €37.5 Billion, Study Finds (April 2, 2025), European Union - European Parliament's Subcommittee on Tax Matters Discusses Digital Taxation (October 17, 2025), News IBFD

- 23 Stephanie Soong, "Network Fee Idea Isn't Back Door to Digital Tax, EU Official Says", Tax Notes International
- 24 Sweden Ministry of Finance Statement, "Global cooperation is key to address tax challenges from digitalization" (June 1, 2018), Orbitax, The Tax Hub "EU to Move Ahead with Digital Tax if Progress Not Made at Global Level"; The Finish Ministry of Finance.
- 25 VERO SKATT, Sharing Economy income (May 27, 2020)
- 26 KPMG member firm in Kenya
- 27 Orbitax, The Tax Hub, "French Finance Minister Confirms Temporary Suspension of Digital Services Tax", France - Digital services tax – payment of single instalment postponed (11 Feb. 2020), News IBFD, KPMG Tax News Flash, "France: Draft administrative regulations, scope of digital services tax" (March 30, 2020), Orbitax, The Tax Hub, "France to Levy Digital Services Tax for 2020 Regardless of OECD Outcome", KPMG Tax News Flash, " France: Digital services tax to be paid in December 2020" (October 19, 2020) and KPMG member firm in France
- 28 France, Law No. 2023-1322 of December 29, 2023, on finances for 2024 (1); KPMG Tax News Flash, "France: Digital services tax upheld (Constitutional Court decision)" (September 15, 2025); France - 'Amazon Prime' and 'Fulfilled by Amazon' Are Out of Scope for French Digital Services Tax, Judges of First Instance Rule (September 29, 2025), News IBFD; France - National Assembly Rejects 2026 Finance Bill (24 Nov. 2025), News IBFD and KPMG Member Firm in France
- 29 CCH, France Consults On Music Streaming Tax Guidelines (July 15, 2024)
- 30 KPMG Tax News Flash, "Germany: Tax treatment of income from online advertising" (May 15, 2019) and Stephanie Soong Johnston, "Germany Willing to Compromise in OECD 'New World Tax Order' Deal", Tax Notes International (January 20, 2020)
- 31 KPMG Tax News Flash, "Germany: Planned digital levy for large digital platforms; other tax developments" (June 27, 2025)
- 32 Greece - Tax treatment of income earned in context of sharing economy through digital platforms (22 July 2019), News IBFD
- 33 KPMG Tax News Flash, "Greece: New digital transaction duty replaces current stamp duty" (September 19, 2024)
- 34 KPMG Tax News Flash, "Hong Kong: Revised guidance, taxation of digital economy and intersection with transfer pricing" (April 3, 2020) and the Government of Hong Kong Press Releases (June 11, 2020)
- 35 KPMG member firm in Hungary and Hungary and KPMG Tax News Flash, "Hungary: Draft legislation introducing tax-related amendments" (November 15, 2022); KPMG member firm in Hungary.
- 36 Ruv.is, Proposed 5% streaming levy to support Icelandic language and culture (October 9, 2025)
- 37 KPMG member firm in India
- 38 KPMG member firm in India
- 39 Orbitax, The Tax Hub, "India Issues Notification that New Digital Services Equalization Levy in Force", "India to Repeal Equalization Levy if International Consensus Reached on Taxation of the Digital Economy", KPMG Tax News Flash, "India: Digital taxation, enlarging the scope of "equalisation levy"" (March 24, 2020), KPMG member firm in India; Orbitax, The Tax Hub, "India Publishes Amendments to Equalization Levy Rules", KPMG Tax News Flash, "India Union Budget 2021-2022" (February 2, 2021), Orbitax, The Tax Hub, "India Finance Act 2021 Enacted", and Government of India, Ministry of Finance Press Release, "Government grants further extension in timelines of compliances. Also announces tax exemption for expenditure on Covid treatment and ex-gratia received on death due to Covid" (June 25, 2021), Stephanie Soong, "India to Scrap Equalization Levy to Pave Way for OECD Tax Deal", Tax Analyst, July 24, 202; KPMG International Member Firm in India, India - Budget 2025: Lower House of Parliament Passes Finance Bill with Amendments, Including Repeal of 6% Equalization Levy (26 Mar. 2025), News IBFD
- 40 KPMG Tax News Flash, "Indonesia: Taxation of e-commerce transactions" (April 15, 2020)
- 41 Orbitax, The Tax Hub, "Israel considering Digital Services Tax"



- 42 Israel - Taxation of foreign digital companies – circular issued (12 Apr. 2016), News IBFD
- 43 KPMG Tax News Flash, "Italy: Details of digital services tax" (January 21, 2020), KPMG Tax News Flash, " Italy: Draft decree to implement digital services tax, consultation open through 31 December" (December 17, 2020), KPMG Tax News Flash, " Italy: Implementing decree for digital services tax; new deadlines" (January 19, 2021), KPMG Tax News Flash, "Italy: Extended deadlines for digital services tax" (March 10, 2021), KPMG Tax News Flash, "Italy: Relief measures suspend tax collection, extend digital services tax deadlines" (April 8, 2021) and KPMG member firm in Italy; Tax Notes, Italy Might Retain and Modify DST if Pillar 1 Isn't Implemented, March 21, 2024; KPMG Tax News Flash, " Italy: Digital Service Tax thresholds removed" (October 24, 2024); Italy - Tax Authorities Clarify Game Bonuses Excluded from Digital Services Tax Taxable Base (June 4, 2025), News IBFD
- 44 Ryan Finley, "Japanese Government-Appointed Panel Will Assess DST Adoption", Tax Notes International (March 8, 2021), William Hoke, "Japanese Panel Issues Report on Taxation of Digital Economy", Tax Notes International (August 23, 2021)
- 45 KPMG Tax News Flash, "Kenya: Tax provisions in Finance Act, 2019" (November 26, 2019), KPMG Tax News Flash, " Kenya: Tax measures in Finance Act, 2020" (July 14, 2020), KPMG Tax News Flash, "Kenya: Digital services tax, first return and payment expected in February 2021" (January 27, 2021); KPMG Tax News Flash, "Kenya: Tax measures enacted in Finance Act, 2021" (July 13, 2021) and William Hoke, "Kenya Seeks Doubling of Digital Services Tax Rate to 3 percent", Tax Notes International (April 13, 2022); KPMG International member firm in Kenya, Finance Bill, 2024 Analysis, May 2024; KPMG Tax News Flash, "Kenya: Tax proposals in Finance Bill 2025, including introduction of APAs" (May 15, 2025)
- 46 Orbitax, The Tax Hub, "Laos Establishes Tax Obligations for Non-Resident E-Commerce and Digital Service Platform Providers" and KPMG member firm in Laos
- 47 Primus Derling, "PADZIĻINĀTA JURIDISKA EKSPERTĪZE PAR DIGITĀLĀ NODOKĻA IEVIEŠANAS IESPĒJĀM LATVIJĀ UN ATZINUMS AR PRIEKŠLIKUMIEM PAR DIGITĀLĀ NODOKĻA IEVIEŠANAS IESPĒJĀM, ŅEMOT VĒRĀ PIEAUGOŠO ĀRVALSTU DIGITĀLO MEDIJU DALĪBU LATVIJAS MEDIJU TIRGŪ"
- 48 Inland Revenue Board of Malaysia, "Guidelines on Taxation of electronic commerce transactions" (May 13, 2019)
- 49 KPMG Tax News Flash, "Mexico: Details of tax reform legislation" (November 14, 2019), KPMG Tax News Flash, "Mexico: Tax reform for 2020; focus on international taxation, digital taxation, other items" (December 19, 2019), KPMG Tax News Flash, " Mexico: Guidance on remitting withholding taxes related to digital services" (July 22, 2020), Orbitax, The Tax Hub, " Mexico Publishes Decree to Implement 2021 Economic Package"; KPMG Tax News Flash, "Mexico: Tax legislative changes for 2021 and digital services" (January 11, 2021), KPMG Tax News Flash, "Mexico: List of 201 registered foreign providers of digital services (as of 31 December 2023)
- 50 Nepal Finance Bill 2022; Nepal Finance Bill 2024
- 51 Nepal - Nepal Expands Permanent Establishment Scope to Digital Presence, Proposes Green Tax in Budget 2024-25, (May 29, 2024), News IBFD; Nepal Finance Bill 2024
- 52 KPMG Tax News Flash, "Netherlands: Update on bill to implement EU Directive on reporting obligations of digital platforms (DAC7)" (April 7, 2022)
- 53 Stephanie Soong, "Netherlands Urged to Seek Alternatives if Pillar 1 Tax Deal Fails", 2023 TNTI 204-6
- 54 New Zealand Inland Revenue, Government Tax Policy Wok Programme (August 8, 2019), William Hoke, " New Zealand's Labour Party to Levy a DST if OECD Talks Fail", Tax Notes International (September 11, 2020) and Orbitax, The Tax Hub, " New Zealand Increasing Top Personal Income Tax and Considering Introduction of DST"; New Zealand, 'Wellbeing Budget 2023', May 18, 2023; New Zealand, Digital Services Tax Bill 2023; KPMG Member Firm in New Zealand; KPMG Tax News Flash, "New Zealand: Tax measures in 2025 budget" (May 22, 2025)
- 55 KPMG Tax News Flash, "Nigeria: Tax provisions in Finance Act, 2020" (January 16, 2020), KPMG Tax News Flash, " Foreign companies having "significant economic presence" for tax purposes" (June 1, 2020) and KPMG Tax News Flash, " Nigeria: Summary of matters arising from implementation of Finance Act, 2021" (July 25, 2022)
- 56 Nigeria - Nigeria Implements Electronic Money Transfer Levy (September 10, 2024), News IBFD
- 57 Orbitax, The Tax Hub, "Norway to Introduce Unilateral Digital Tax if International Organizations Fail to Find a Solution in 2020"
- 58 KPMG Tax News Flash, " KPMG report: Summary and initial analysis of Pillar One Blueprint" (October 12, 2020) and KPMG Tax News Flash, "KPMG report: Summary and initial analysis of Pillar Two Blueprint" (October 12, 2020), OECD "Model Rules for Reporting by Platform Operators with respect to Sellers in the Sharing and Gig Economy", KPMG Tax News Flash, "OECD: Agreement for global minimum tax, to resolve international taxation of digital economy" (October 8, 2021) and KPMG Tax News Flash, "OECD: Pillar Two model rules for domestic implementation of 15% global minimum tax" (December 20, 2021); Taxnotes, Countries Advance Pillar 1 Adoption, Extend Digital Tax Freeze, July 12, 2023; OECD, THE MULTILATERAL CONVENTION TO IMPLEMENT AMOUNT A OF PILLAR ONE, October 11, 2023; OECD/G20 Base Erosion and Profit Shifting Project, Update to Pillar One timeline by the OECD/G20 Inclusive Framework on BEPS, December 18, 2023

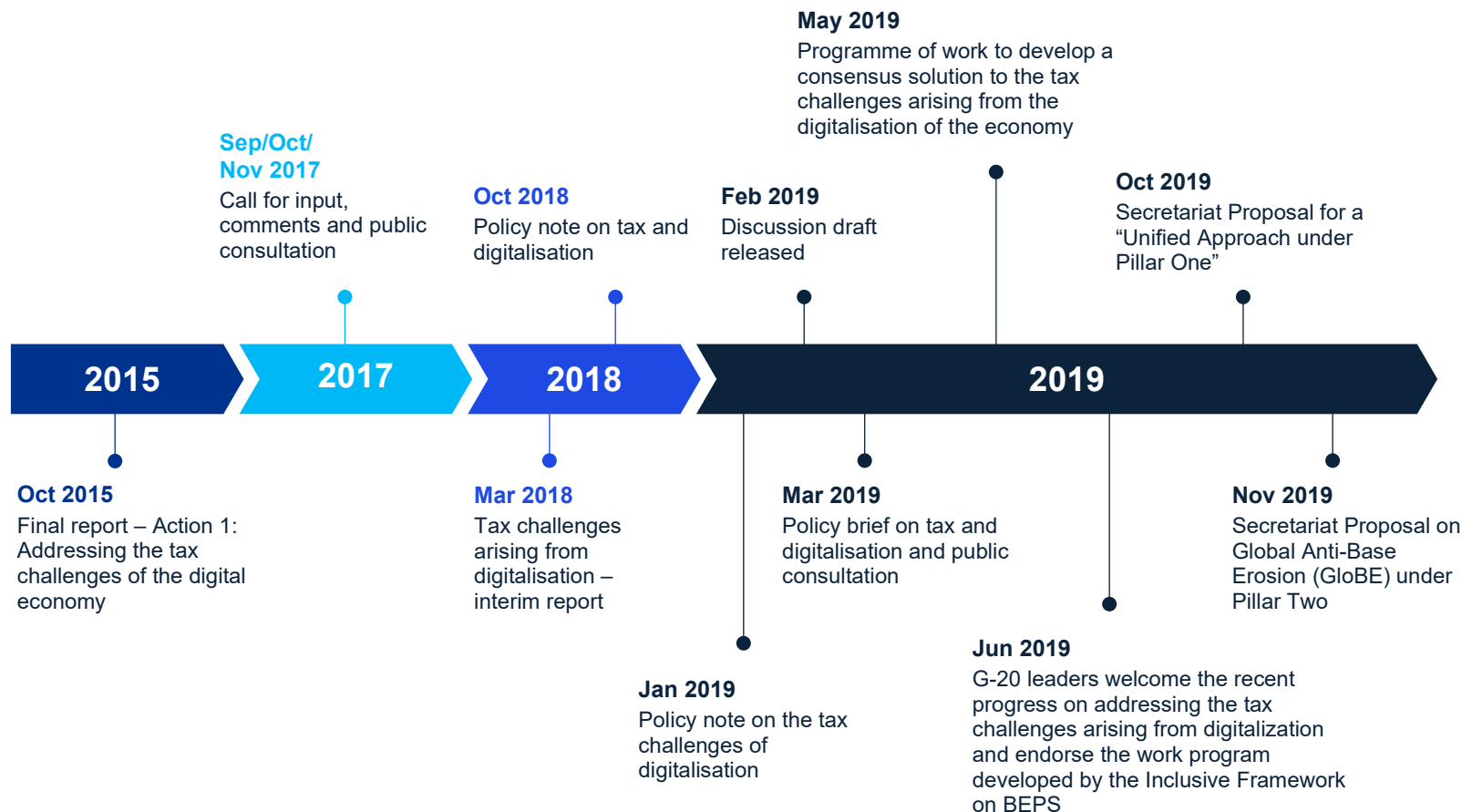
- 59 Orbitax, The Tax Hub, "Pakistan Publishes Finance Act 2018"
- 60 KPMG Member firm in Pakistan
- 61 KPMG Tax News Flash, "Pakistan: Direct and indirect tax measures in Finance Act, 2024" (July 3, 2024)
- 62 Benítez Cudas & Asociados - KPMG Member Firm in Paraguay, Orbitax, The Tax Hub, "Paraguay Implements Withholding on Digital Services", Orbitax, The Tax Hub, "Paraguay Published Decree on INR Withholding for Digital Services", Orbitax, The Tax Hub, "Paraguay Establishes Simplified Mechanism for Registration and Payment of INR by Non-Resident Digital Service Providers" and Orbitax, The Tax Hub, "Paraguay Issues New Resolution on Simplified Mechanism for Registration and Payment of INR by Non-Resident Digital Service Providers"
- 63 KPMG Tax News Flash, "Poland: Intent to introduce new windfall profits tax on banking sector announced; proposed legislation introducing packaging fee" (August 20, 2025)
- 64 KPMG Tax News Flash, "Poland: Proposed levy or advertising contribution, would apply for traditional and online advertising" (February 4, 2021) and Poland to Overhaul Advertising Tax Proposal, Tax Notes International (February 17, 2021)
- 65 KPMG Member Firm in Peru
- 66 Romania - European Commission proposals on taxation of digital economy – Parliament decisions published (12 June 2016) News IBFD
- 67 Orbitax, The Tax Hub, "Russian Government Approves Plan to Support IT Industry Including Measures for Taxation of Foreign Providers" (September 16, 2021)
- 68 Rwanda - Tax Bills 2025: Government Gazettes New Law Introducing Digital Service Tax (June 5, 2025), News IBFD.
- 69 Sierra Leone - Sierra Leone Introduces Digital Services Tax (14 Jan. 2021), News IBFD; Sierra Leone – Finance Act 2024 and KPMG Member Firm in Sierra Leone
- 70 Ms. Indraneel Rajah's speech, Senior Minister Of State for Law and Finance, Smu-TA Centre for Excellence in Taxation Conference (August 17, 2017) and Singapore - Singapore Clarifies Tax Treatment of Foreign Digital Taxes (07 Dec. 2020), News IBFD
- 71 Orbitax, The Tax Hub, "Slovak Republic Publishes Release on New PE Rules for Digital Platforms" and Slovak Republic - Digital Taxation Monitor, Tables IBFD
- 72 Bloomberg Tax, Slovakia Mulls Digital Services Tax to Shore Up Budget (August 19, 2025)
- 73 KPMG member firm in Slovenia
- 74 Stephanie Soong Johnston, "South Africa Won't Move on Its Own to Tax Digital Activity", Tax Notes International (August 31, 2020)
- 75 KPMG Tax News Flash, "Spain: Digital services tax legislation, update" (March 16, 2020), William Hoke, "Spanish Parliament Approves Digital and Financial Services Taxes", Tax Notes International (October 12, 2020), KPMG Tax News Flash, "Spain: Digital services tax finalized, effective in January 2021" (October 21, 2020), KPMG Tax News Flash, "Spain: Final rules for digital services tax; first declaration is due July 2021" (June 11, 2021), Spain - Government Amends Digital Services Tax Form (02 June 2022), News IBFD, KPMG Tax News Flash, "Spain: Guidance on online "intermediation" subject to digital services tax" (December 22, 2022), Spain - Government Amends Digital Services Tax Form (31 Mar. 2023), News IBFD
- 76 Spain - Barcelona Delivery Fee on E-Commerce Companies Is Null and Void, Court of Justice Says (August 23, 2024), News IBFD
- 77 Sweden Ministry of Finance Statement, "Global cooperation is key to address tax challenges from digitalization" (June 1, 2018)
- 78 Swiss State Secretariat for International Finance, "Updated position in the taxation of the digitalised economy" (September 12, 2019) and Swiss State Secretariat for International Finance, "Review on international financial and tax matters 2020" (January 11, 2021)
- 79 KPMG Tax News Flash, "Lex Netflix and VAT" (February 9, 2023)
- 80 KPMG Tax News Flash, "Taiwan - E-services income tax regime" (January 3, 2018)
- 81 KPMG Tax News Flash, "Tanzania: Tax measures in Finance Act, 2022" (July 12, 2022); KPMG Tax News Flash, "Tanzania: Tax measures in Finance Act, 2023" (July 14, 2023)
- 82 Tanzania, Finance Act 2024, June 28, 2024

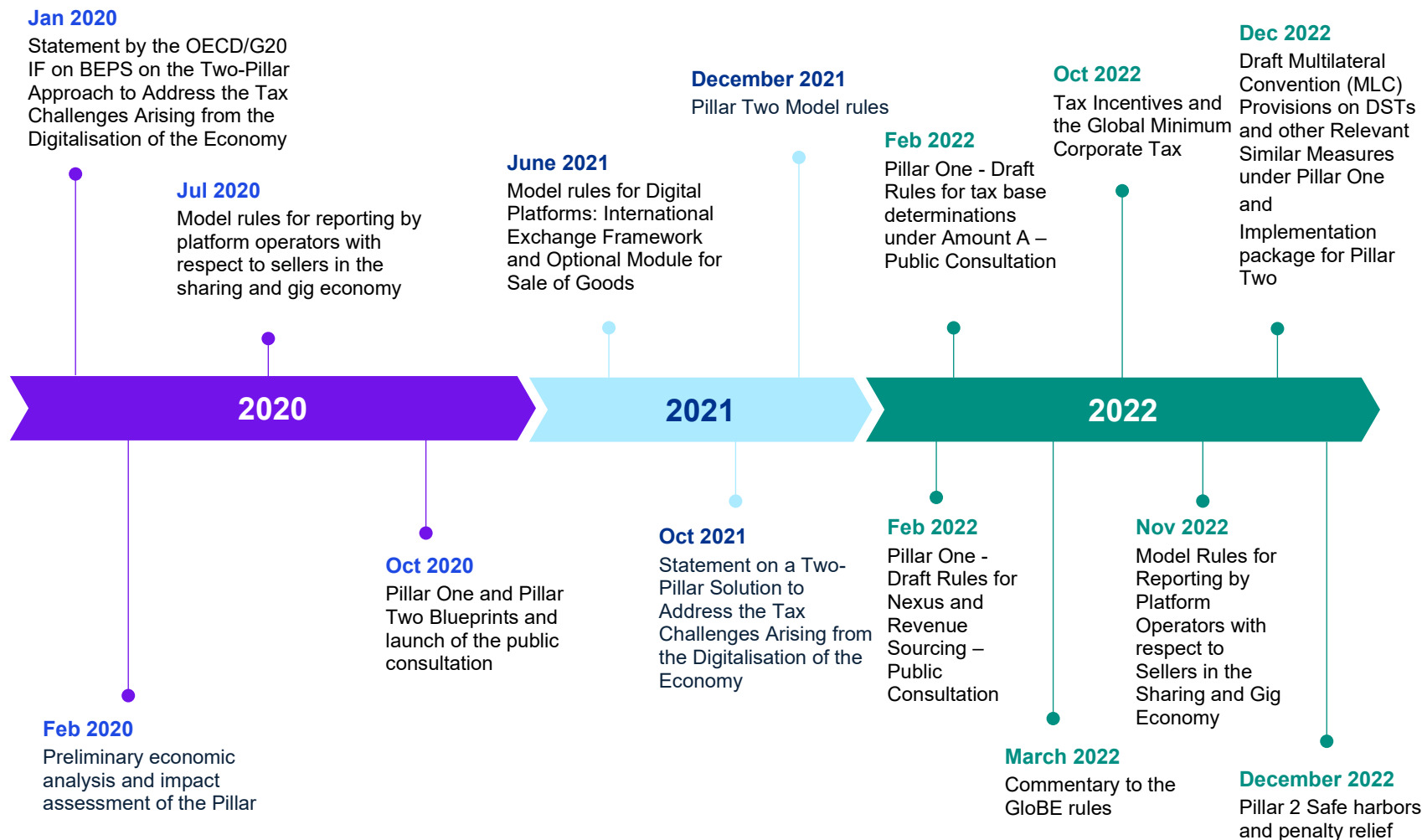
- 83 Orbitax, The Tax Hub, "Thailand Planning Withholding Tax on E-Commerce payments"
- 84 Orbitax, The Tax Hub, "Tunisia Finance Law for 2020 Approved and Published" and Tunisia - Digital Taxation Monitor, Tables IBFD
- 85 Tunisia - Tunisia Clarifies New Tax Obligations for Online Sellers and Delivery Services (March 25, 2025), News IBFD
- 86 Türkiye - Communiqué on withholding tax regarding advertising services published (15 Feb. 2019), News IBFD
- 87 KPMG Tax News Flash, "Türkiye: Legislative proposal for digital services tax" (November 5, 2019), KPMG Tax News Flash, "Türkiye: Digital services tax enacted, effective date of March 2020" (December 11, 2019), KPMG Tax News Flash, "Türkiye: Digital services tax, update" (March 20, 2020), and also KPMG Tax News Flash, "Türkiye: Digital services tax, a primer" (April 21, 2020), Orbitax, Türkiye Considering DST Increase for Foreign Digital Service Providers (October 30, 2025)
- 88 Uganda - Uganda to Tax Non-Resident Providers of Digital Services (31 Mar. 2023), News IBFD and KPMG Member Firm in Uganda; KPMG member firm in Uganda; Uganda approves 5% Digital Services Tax on Non-Resident Providers of Digital Services, (July 14, 2023), News IBFD; Uganda - Uganda Issues Guidelines on Implementation of Digital Service Tax, (October 25, 2023), Uganda - Budget 2025 In Depth: Government Approves Several Income Tax Exemptions (July 9, 2025), News IBFD
- 89 KPMG Tax News Flash, "Ukraine: Draft legislation concerning the digital economy" (September 7, 2021) and Ukraine government Diia City homepage
- 90 KPMG Tax News Flash, "Ukraine: Proposed legislation for digital platform reporting and withholding tax requirements" (April 10, 2025).
- 91 KPMG Tax News Flash, "Draft Finance Bill: UK Digital Services Tax" (July 12, 2019) and KPMG Tax News Flash, "UK: Initial impressions of business tax measures in 2020 budget" (March 11, 2020), KPMG Tax News Flash, "UK: Digital services tax, effective date set for 1 April 2020" (March 21, 2020), KPMG Tax News Flash, "UK: HMRC guidance, registration rules for digital services tax" (April 15, 2020), Stephanie Soong Johnston "U.K. Parliamentary Committee Waves Digital Tax Through", Tax Notes International (June 12, 2020), KPMG Tax News Flash, "UK: House of Commons passes digital services tax legislation" (July 10, 2020), Stephanie Soong Johnston "U.K. Digital Services Tax Becomes Law, Stoking Trade Tensions", Tax Notes International (July 23, 2020), HMRC, Digital Service Tax Manual (5 August 2020), and Stephanie Soong Johnston "HMRC Reporting Rules for Digital Platforms Take Shape", Tax Notes International (August 2, 2021) and KPMG EU Tax Centre E-News 127.; Forty-fourth Report of Session 2022–23, HMRC, Digital Services Tax; T
- 92 Orbitax, The Tax Hub, "UK Introducing Reporting Rules for Digital Platforms from January 2024"; HMRC, "internal manual, International Exchange of Information Manual, updated November 14, 2023
- 93 Nana Ama Sarfo, "Why the United Nations Digital Tax Proposal Deserves More Attention", Tax Notes International (August 24, 2020), Sarah Paez, "U.N. Tax Committee Debates Whether Software Payments Are Royalties", Tax Notes International (September 3, 2020), Stephanie Soong Johnston, "U.N. Committee Approves Digital Services Tax Treaty Article Text", Tax Notes International (April 21, 2021) and Orbitax, The Tax Hub, "UN Releases 2021 Model Tax Convention"; International Consortium of Investigative Journalists, UN votes to create 'historic' global tax convention despite EU, UK moves to 'kill' proposal, November 22, 2023; "South Centre Inputs on "Terms of Reference for a UN Framework Convention on International Tax Cooperation", March 15, 2024; UN, Zero Dra) Terms of Reference for a United Nations Framework Convention on International Tax Cooperation, June 7, 2024; UN News, Why the world needs a UN global tax convention
- 94 KPMG Tax News Flash, "United States launches investigation of digital services taxes" (June 2, 2020), KPMG Tax News Flash, "United States reportedly withdrawing from talks with EU on digital services tax" (June 17, 2020), KPMG Tax News Flash, "French digital services tax; additional 25% customs duties suspended until January 2021" (July 14, 2020), Orbitax, The Tax Hub, "U.S. House Resolution Opposing Digital Services Taxes", KPMG Tax News Flash, "Additional customs duties on imports from France suspended, digital services tax investigation" (January 7, 2021), KPMG Tax News Flash, "U.S. findings from investigations of digital services taxes in India, Italy, Türkiye" (January 7, 2021), KPMG Tax News Flash, "U.S. findings from investigations of digital services taxes in Austria, Spain, United Kingdom" (January 14, 2021), KPMG Tax News Flash, "United States drops "safe harbor" request on proposed digital tax rules" (February 26, 2021), KPMG Tax News Flash, "USTR announces hearings, requests comments about investigations of digital services taxes" (March 30, 2021), KPMG Tax News Flash, "United States suspends tariffs on goods from six countries, digital services tax investigations" (June 2, 2021), Stephanie Soong Johnston, "U.S., European Countries Avert Trade War Over Digital Taxes", Tax Notes International (October 25, 2021), KPMG Tax News Flash, "United States and Türkiye announce digital services tax agreement" (November 22, 2021), KPMG Tax News Flash, "United States and India: Agreement regarding "equalization levy" (November 24, 2021), "Statement by USTR Spokesperson Adam Hodge on Canada's Digital Services Tax As Described in Canada's Notice of Ways and Means Motion to Introduce an Act to Implement a Digital Services Tax" (December 15, 2021), Stephanie Soong Johnston, "USTR Must Push Back if Canada Moves on Digital Tax, Senators Say", Tax Notes International (January 14, 2022), KPMG Tax News Flash, "U.S. government's comments opposing Canada's digital services tax proposal" (February 22, 2022) and United States - US Trade Representative to Monitor Imposition of Digital Services Tax by Trading Partners in 2023 (06 Mar. 2023), News IBFD; KPMG Tax News Flash, "U.S. Treasury statement regarding extended agreement on digital services taxes imposed by Austria, France, Italy, Spain, United Kingdom" (February 15, 2024); KPMG Tax News Flash, "United States and Türkiye announce updated digital services tax agreement" (March 12, 2024); Joint Committee on Taxation, Background and Analysis of Multinational Enterprises and the Potential Reallocation of Taxing Rights Under the OECD's Pillar One; March 5, 2024;

KPMG Tax News Flash, "White House announces directive to counter digital service taxes (DSTs)" (February 24, 2025), KPMG Tax News Flash, "Legislative update: Ways and Means Republicans reintroduce OECD Pillar Two reciprocity bill" (March 28, 2025); United States - USTR Flags Denmark's Streaming Tax and Germany's IP Withholding Tax as Barriers to US Exporters in 2025 Trade Report (April 2, 2025), News IBFD, KPMG Tax News Flash, "Legislative update: House passes "One Big Beautiful Bill Act" (May 22, 2025); United States – United States Warns of New Tariffs Against Countries with Digital Services Taxes (August 26, 2025), News IBFD; KPMG Tax News Flash, "Fourth Circuit: Maryland digital advertising tax violates First Amendment" (August 15, 2025); Tax Notes, Asia-U.S. Trade Deals Set Up Digital Services Tax Carveouts (October 29, 2025)

- 95 KPMG Tax News Flash, "Uruguay: Taxation of the digital economy, implementing decree" (May 29, 2018) and KPMG member firm in Uruguay
- 96 KPMG Tax News Flash, "Vietnam: Taxation of e-commerce transactions, remote digital sales" (July 2, 2019), "Vietnam: Taxation of e-commerce transactions, implications for banks" (July 24, 2019), KPMG Tax News Flash, "Vietnam: Taxation of e-commerce, withholding rules effective in 2021" (June 24, 2020) and Vietnam - Digital Taxation Monitor, Tables IBFD; Vietnam - Vietnam Enacts New Law on Corporate Income Tax, Expands PE Definition, Amends Preferential CIT Regime (July 10, 2025), News IBFD
- 97 Orbitax, The Tax Hub, "Zimbabwe Taxation of e-Commerce Platforms"

## OECD Milestones – Direct taxes





## Feb and July 2023

Technical Guidance for the implementation of the global minimum tax

## December 2023

Technical Guidance for the implementation of the global minimum tax

## June 2024

Technical Guidance for the implementation of the global minimum tax

2023

2024

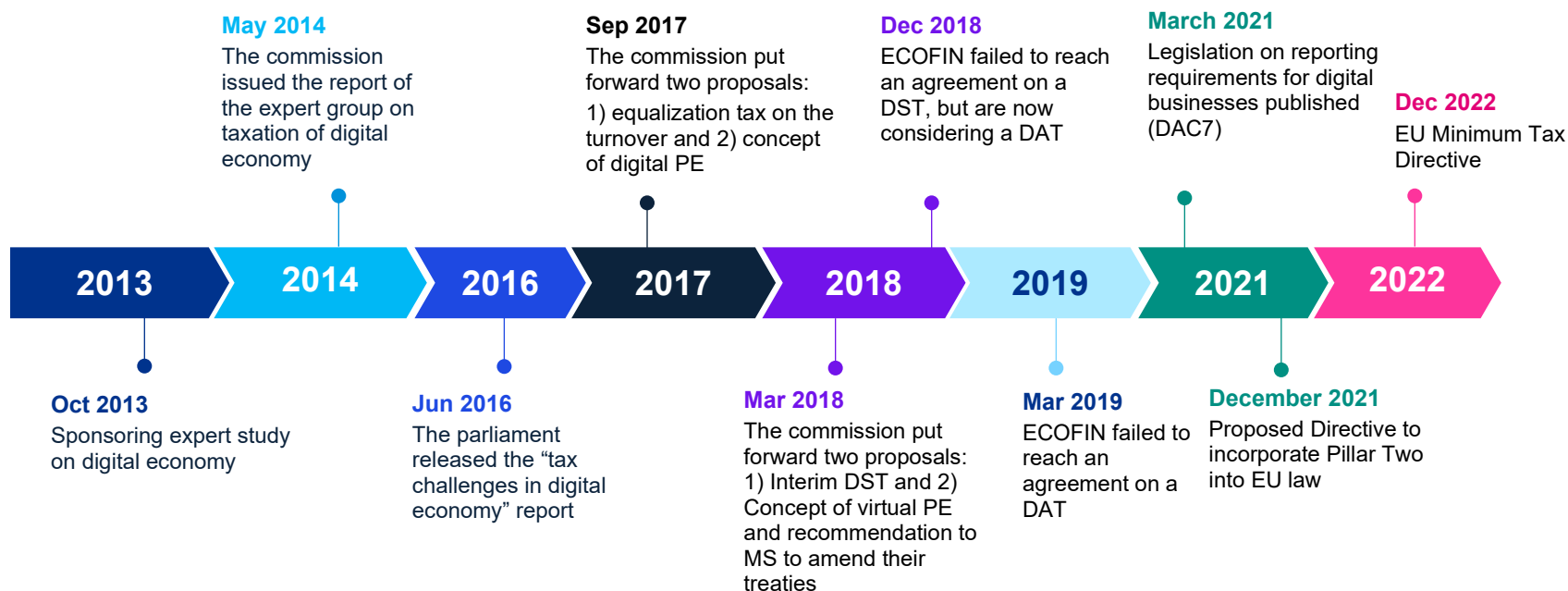
## July 2023

GloBE Information Return - GRI

## Feb 2024

Report and reader Guide on Amount B

### EU Milestones – Direct taxes





# Taxation of the digitalized economy

**Indirect taxes**

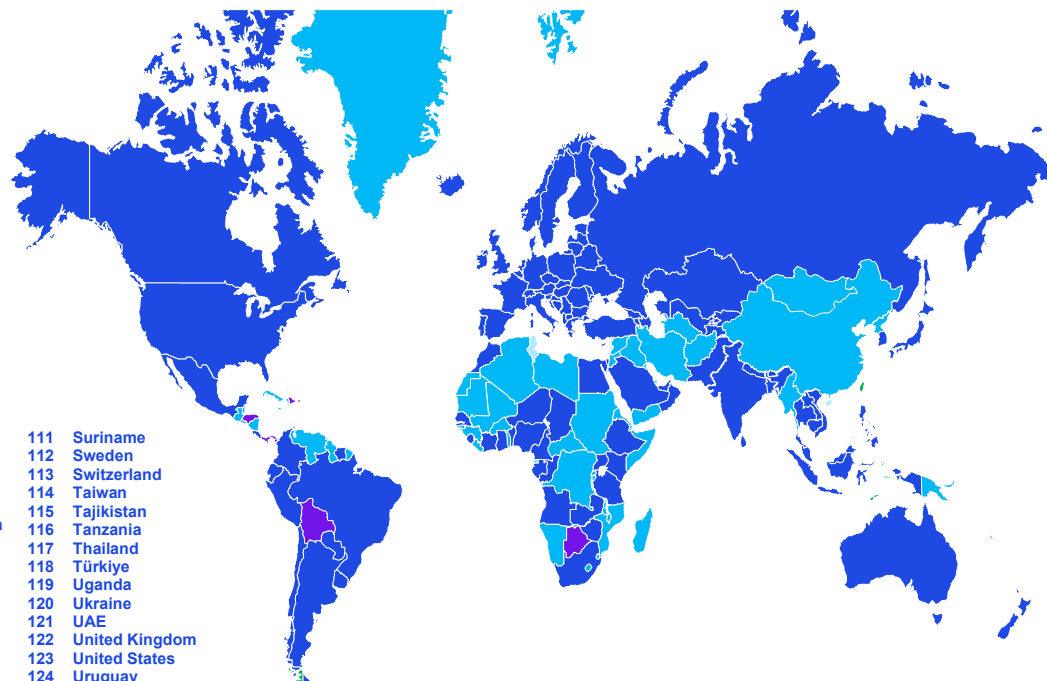
## Taxation of the digitalized economy – indirect taxes

# Indirect taxes

1 Albania  
 2 Andorra  
 3 Angola  
 4 Antigua  
 5 Argentina  
 6 Armenia  
 7 Aruba  
 8 Australia  
 9 Austria  
 10 Azerbaijan  
 11 Bahamas  
 12 Bahrain  
 13 Bangladesh  
 14 Barbados  
 15 Belarus  
 16 Belgium  
 17 Benin  
 18 Bhutan  
 19 Bolivia  
 20 Bosnia and Herzegovina  
 21 Botswana  
 22 Brazil  
 23 Bulgaria  
 24 Cabo Verde  
 25 Cambodia  
 26 Cameroon  
 27 Canada  
 28 Chad  
 29 Chile  
 30 Colombia  
 31 Congo (rep. of)  
 32 Costa Rica  
 33 Croatia  
 34 Cyprus  
 35 Czech R.  
 36 Denmark  
 37 Dominican R.  
 38 Ecuador  
 39 Egypt  
 40 Estonia  
 41 Ethiopia  
 42 Fiji  
 43 Finland  
 44 France  
 45 French Polynesia  
 46 Gabon  
 47 Georgia  
 48 Germany  
 49 Ghana  
 50 Greece  
 51 Guatemala  
 52 Honduras  
 53 Hungary  
 54 Iceland  
 55 India  
 56 Indonesia

57 Ireland  
 58 Israel  
 59 Italy  
 60 Ivory Coast  
 61 Japan  
 62 Kazakhstan  
 63 Kenya  
 64 Kosovo  
 65 Kyrgyzstan  
 66 Laos  
 67 Latvia  
 68 Liechtenstein  
 69 Lithuania  
 70 Luxembourg  
 71 Malaysia  
 72 Malta  
 73 Mauritius  
 74 Mexico  
 75 Moldova  
 76 Monaco  
 77 Montenegro  
 78 Morocco  
 79 Nepal  
 80 Netherlands  
 81 New Caledonia  
 82 New Zealand  
 83 Niger  
 84 Nigeria  
 85 North Macedonia  
 86 Norway  
 87 Oman  
 88 Pakistan  
 89 Palau  
 90 Panama  
 91 Paraguay  
 92 Peru  
 93 Philippines  
 94 Poland  
 95 Portugal  
 96 Puerto Rico  
 97 Romania  
 98 Russia  
 99 Rwanda  
 100 Saudi Arabia  
 101 Senegal  
 102 Serbia  
 103 Sierra Leone  
 104 Singapore  
 105 Slovakia  
 106 Slovenia  
 107 South Africa  
 108 South Korea  
 109 Spain  
 110 Sri Lanka

111 Suriname  
 112 Sweden  
 113 Switzerland  
 114 Taiwan  
 115 Tajikistan  
 116 Tanzania  
 117 Thailand  
 118 Türkiye  
 119 Uganda  
 120 Ukraine  
 121 UAE  
 122 United Kingdom  
 123 United States  
 124 Uruguay  
 125 Uzbekistan  
 126 Vietnam  
 127 Zambia  
 128 Zimbabwe



■ 117 Legislations Enacted  
 ■ No Development  
 ■ 11 Draft Legislation/ Public Consultation

# Taxation of the digitalized economy – indirect taxes

To learn more about Taxation of the digitalized economy [BEPS Pillar One and Pillar Two \(kpmg.us\)](https://www.kpmg.us) “The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of KPMG LLP concerning the legal status of any country, territory, city or any area or of its authorities or concerning the delineation of its frontiers or borders.”

## Country specific detail – Indirect taxes

| <div> <div>✓ Enacted</div> <div>● Proposed / Announced</div> <div>✗ Proposal rejected</div> </div> |             |                    |   |      |  |
|--|-------------|--------------------|---|------|--|
| Country  | Status      | Latest development | Brief description   | Cite |  |
| Albania  | ✓ Enacted   | November 12, 2014  | Effective January 1, 2015, Albania requires non-resident vendors of digital services to consumers (B2C) in Albania to register for and collect VAT, regardless of the sales amount.   | 1    |  |
|  | ● Announced | May 15, 2025       | On May 14, 2025, the Albanian tax authority published a notice reminding multinational companies providing digital services to consumers in Albania to appoint a tax representative in Albania, register for VAT, apply a 20 percent VAT rate on sales to final consumers, and pay the VAT through the representative. For services to businesses registered for VAT in Albania, the recipients must self-assess the VAT. The notice specifies that telecommunications, broadcasting, web services, software, databases, media, games, and distance teaching are subject to VAT. The authorities have been actively identifying foreign entities engaging with Albanian consumers and have warned of administrative and legal actions for non-compliance. | 2    |  |
| Andorra  | ✓ Enacted   | October 1, 2013    | Effective January 1, 2014, Andorra requires non-resident vendors of digital services to consumers (B2C) in Andorra to register for and collect VAT if their sales exceed EUR 40,000 in a 12-month period.   | 3    |  |
|  | ✓ Enacted   | August 20, 2022    | On July 20, 2022, Andorra published Law 24/2022, which, among other things, clarifies that VAT is not applicable on cryptocurrency mining activities.   | 4    |  |
| Angola   | ✓ Enacted   | August 1, 2022     | Effective October 1, 2019, Angola requires non-residents providing remote services, including digital services, to consumers (B2C) in Angola to register for and collect VAT, regardless of the sales amount.   | 5    |  |
|  | ✓ Enacted   | April 6, 2024      | On December 28, 2023, Angola enacted Law No. 14/23, introducing new VAT rules for e-commerce transactions, making sales taxable in Angola if the buyer is based there, or if a local financial institution facilitates the payment. The law, applicable to both B2C and B2B sales, doesn't specify any compliance requirements for e-commerce platforms nor does it clarify the interaction between VAT and import rules, thus, further implementing rules are expected from the Angolan tax authorities.   | 6    |  |
| Antigua  | ● Announced | February 1, 2021   | The government of Antigua and Barbuda recently announced that it is considering amending Antigua's sales tax legislation to allow for the application of the sales tax to online purchase, with details of the regime to be released after they are finalized.  | 7    |  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country   | Status | Latest development | Brief description  | Cite |
|-----------|--------|--------------------|--|------|
| Argentina | ✓      | Enacted            | <p>December 1, 2022</p> <p>Effective June 25, 2018, Argentinean financial intermediaries, including credit and debit card providers, are required to add and withhold VAT when an Argentinean user pays for digital services provided by non-residents.</p> <p>Argentina's tax authority (AFIP) has published an updated list of digital service providers that are subject to VAT withholding on supplies made to Argentine residents. The updated list is effective from September 2020 and includes over 400 entities.</p> <p>The AFIP published an updated list of digital service providers that are subject to VAT withholding on supplies made to Argentine residents. The updated list is effective from December 2022 and includes over 900 entities.</p> | 8    |
|           | ✓      | Enacted            | <p>December 3, 2019</p> <p>The AFIP and the tax collection agency of the Buenos Aires Province (ARBA) issued Joint General Resolutions 4632 and 37/2019, which regulate the reporting and payment to the Buenos Aires Province gross receipts tax on digital services from banks, credit card companies and other agents acting as substitute taxpayers of non-resident service providers. These taxpayers must report and pay amounts withheld from the digital services under the rules established by General Resolution 2233 (SICORE System) and have the option to report the accumulated amount for each user monthly. The Resolutions are effective December 1, 2019.</p>   | 9    |
|           | ✓      | Enacted            | <p>November 22, 2021</p> <p>On November 16, 2021, Argentina published Decree 796/2021, which introduces a 0.6 percent financial transaction tax applicable to transactions involving virtual currencies.</p>   | 10   |
|           | ✓      | Enacted            | <p>January 30, 2023</p> <p>On January 23, 2023, Argentina published General Resolution 5319, which requires digital platforms to act as VAT withholding agents for the sale of products and provision of services performed through the platforms by local vendors effective April 1, 2023. The withholding amount varies depending on the status of the local seller: 1 percent for taxable persons; between 3 and 7 percent for taxable persons considered non-compliant; 7 percent for sellers under the simplified tax regime; and 8 percent for non-registered taxable persons.</p>   | 11   |
| Armenia   | ✓      | Enacted            | <p>November 18, 2021</p> <p>Effective January 1, 2022, Armenia requires non-resident vendors of digital services to consumers (B2C) in Armenia to register for and collect VAT, regardless of the sales amount.</p>  | 12   |
| Aruba     | ✓      | Enacted            | <p>January 6, 2023</p> <p>Effective January 1, 2023, Aruba requires non-resident vendors of certain services, including digital services, to consumers (B2C) in Aruba to register for and collect VAT, regardless of the sales amount.</p>   | 13   |
| Australia | ✓      | Enacted            | <p>May 13, 2016</p> <p>Effective July 1, 2017, Australia requires non-residents (including online platforms) providing remote services, including digital services, to consumers (B2C) in Australia to register for and collect GST if their sales exceed AUD 75,000 in a 12-month period.</p>   | 14   |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status      | Latest development | Brief description  | Cite |
|---------|-------------|--------------------|--|------|
|         | ✓ Enacted   | December 12, 2019  | The Australian Taxation Office (ATO) finalized GST Ruling GSTR 2019/1, which clarifies when a sale of a service is connected with the indirect tax zone (Australia) for GST purposes. The Ruling applies from October 1, 2016 and supersedes previous rulings on this matter without material amendments, except that the new ruling also covers digital sales.  | 15   |
|         | ✓ Enacted   | September 9, 2019  | Effective July 1, 2019, offshore sellers of Australian hotel accommodation are required to charge GST in the same way as local sellers if their sales exceed AUD 75,000 in a 12-month period.  | 16   |
|         | ✓ Enacted   | June 19, 2017      | Effective July 1, 2018, non-resident vendors (including online platforms) selling low value consignments of goods valued below AUD 1,000 to Australian consumers (B2C) must register for and collect GST if their sales exceed AUD 75,000 in a 12-month period.  | 17   |
|         | ● Announced | August 19, 2022    | On March 21, 2022, the Australian government tasked the Australian Board of Taxation with reviewing an appropriate policy framework for the taxation of digital assets and transactions in Australia. This includes reviewing the current Australian taxation treatment of digital assets and transactions and emerging tax policy issue and recommending if changes are necessary.<br><br>In August 2022, the Board published a Consultation Guide, which provides an overview of crypto assets and the current taxation treatment within Australia. The guide outlines recent relevant government reports and announcements and poses a series of questions for interested parties to consider when formulating input to the review. | 18   |
|         | ● Announced | August 10, 2022    | On August 10, 2022, the ATO released a draft update to its GST guidance GSTR 2002/2 Goods and service tax: GST treatment of financial supplies and related supplies and acquisitions, which reflects changes in the GST law such as changes to the GST rules applicable to cross-border sales of services as applied to digital currency.  | 19   |
|         | ● Proposed  | August 28, 2024    | On August 27, 2024, the state of Victoria proposed the Short Stay Levy Bill 2024, which would introduce a levy on short stay accommodations in the state effective from January 1, 2025. The levy, amounting to 7.5 percent of the total booking fee, would apply to stays of less than 28 days in premises that are not the principal place of residence of the owner or renter. The responsibility for the levy would fall on the provider of a booking platform or the owner or renter of the premises. Those accepting bookings for short stays would be required to register with the Commissioner and lodge returns every three months or annually, depending on their total booking fees.                                       | 20   |
| Austria | ✓ Enacted   | January 1, 2019    | Effective July 1, 2003, Austria requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Austria to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Austria applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 21   |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted

● Proposed / Announced

✗ Proposal rejected

| Country    | Status      | Latest development | Brief description   | Cite |
|------------|-------------|--------------------|---|------|
|            | ✓ Enacted   | July 1, 2021       | Effective July 1, 2021, Austria requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Austrian consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 22   |
|            | ✓ Enacted   | October 25, 2019   | On October 31, 2019, Austria published in the official gazette the digital tax package ( <i>Digitalsteuerpaket</i> ) which introduces a new reporting requirement for digital platforms facilitating the sale of goods and services to final consumers (B2C) in Austria effective January 1, 2020.  | 23   |
| Azerbaijan | ✓ Enacted   | April 21, 2021     | On April 16, 2021, the Azerbaijani Ministry of Taxes clarified that banks are obligated to calculate and withhold VAT from purchases paid online by individuals not registered with the tax authority.  | 24   |
|            |             |                    | Effective January 1, 2023, Azerbaijan adopted a law requiring non-residents providing goods or services to residents through electronic platforms to register for and collect VAT.  |      |
|            | ✓ Enacted   | July 9, 2024       | In November 2023, the government of Azerbaijan published the implementation regulations regarding the requirement for non-residents to register for and collect VAT on sales of digital services to final consumers in Azerbaijan, regardless of the sales amount.  | 25   |
|            | ● Announced | May 15, 2025       | Effective June 1, 2024, the Azerbaijan tax authority launched the registration portal for non-resident digital services providers to voluntarily collect and remit VAT on sales of digital services.<br>The tax authority of Azerbaijan is considering recommending revisions to the VAT rules relating to non-resident digital services sales, effective January 1, 2026. Key changes would include explicitly excluding business-to-business transactions from the rules, implementing mandatory VAT registration with a six-month transition period, shifting reporting requirements from monthly to quarterly, and providing additional clarifications to address implementation challenges.  | 26   |
| Bahamas    | ✓ Enacted   | May 15, 2014       | Effective January 1, 2015, The Bahamas requires non-resident vendors (including online platforms) of digital services to customers (B2C and B2B) in The Bahamas to register for and collect VAT if their sales exceed BSD 100,000 in a 12-month period.   | 27   |
|            | ✓ Enacted   | July 1, 2019       | Effective July 1, 2019, all online marketplaces that advertise and facilitate vacation home rentals in The Bahamas are required to register for and collect VAT on their rental and related sales to consumers in The Bahamas regardless of the registration threshold. The new rules seek to provide for the mandatory registration for all online providers of hotels, condos, or marketplaces for vacation home rentals. The law provides a transitional provision that requires any marketplace that is not already a registrant shall apply for registration by October 1, 2019.<br><br>In addition, the Value Added Tax (Amendment) Act, 2019 removes the BSD 100,000 registration threshold for digital services provided through online marketplaces. | 28   |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country    | Status      | Latest development | Brief description   | Cite |
|------------|-------------|--------------------|---|------|
|            | ✓ Enacted   | July 1, 2020       | Effective July 1, 2020, The Bahamas enacted the Value Added Tax (Amendment) Act, 2020, which clarifies that the BSD 100,000 threshold does not apply to digital services provided directly or through an online marketplace.  | 29   |
|            | ● Announced | October 30, 2020   | On October 27, 2020, The Bahamas government announced the enforcement of the collection of VAT on digital services provided by foreign entities and consumed in the Bahamas.  | 30   |
| Bahrain    | ✓ Enacted   | December 24, 2018  | Effective January 1, 2019, Bahrain requires non-resident vendors of digital services to consumers (B2C) in Bahrain to register for and collect VAT, regardless of the sales amount.   | 31   |
|            | ✓ Enacted   | January 5, 2021    | On December 31, 2021, Bahrain published VAT Public Clarification VAT/PC/20/3, which clarifies that the effective use and enjoyment of telecommunication services which do not require the customer to be physically present in a specific location is where the customer usually resides. The place of residence of the customer may be determined based on the following criteria: (1) the internet protocol address used by the customer to receive the service; (2) the country code of the SIM card used by the customer to receive the service; (3) the customer's address as stated on the VAT invoice or other documents used for billing; (4) details of the customer's bank account; and (5) other information of a commercial nature. | 32   |
| Bangladesh | ✓ Enacted   | August 10, 2023    | Effective July 1, 2019, Bangladesh requires non-resident vendors of digital services to consumers (B2C) in Bangladesh to register for and collect VAT, regardless of the sales amount.<br><br>On June 11, 2020, Bangladesh's National Board of Revenue issued instructions to local Banks to withhold VAT when remitting money to non-resident service providers. This applies not only in respect of digital services, but any services rendered to local customers by a non-resident service provider.  | 33   |
|            | ✓ Enacted   | September 13, 2021 | Effective June 1, 2023, Bangladesh expanded the scope of its non-resident digital services rules to include intermediation services provided by non-resident marketplaces facilitating the sale of goods or services.   |      |
|            | ✓ Enacted   | September 13, 2021 | Effective July 1, 2021, Bangladesh eliminated the obligation for non-resident digital services providers to appoint a local VAT agent. Non-residents should thus directly register for VAT if they sell digital services to consumers in Bangladesh. For this purpose, the Bangladeshi tax authority has developed a new VAT registration form (i.e., Mushak- 2.2).   | 34   |
| Barbados   | ✓ Enacted   | January 13, 2020   | Effective December 1, 2019, Barbados requires non-resident vendors of digital services to customers (B2C and B2B) in Barbados to register for and collect VAT, regardless of the sales amount.  | 35   |
|            | ● Proposed  | July 31, 2025      | On July 30, 2025, the Barbados government tabled the Tourism Levy (Amendment) Bill 2025 to digitize the collection of the shared economy levy. The proposed legislation requires international online booking platforms to register with the Barbados Revenue Authority and collect the levy at the point of transaction, remitting it directly to the authority. The bill also introduces registration and remittance obligations for digital platforms offering tourism services.   | 36   |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status    | Latest development | Brief description   | Cite |
|---------|-----------|--------------------|---|------|
| Belarus | ✓ Enacted | November 1, 2016   | Effective January 1, 2018, Belarus requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Belarus to register for and collect VAT, regardless of the sales amount.  | 37   |
|         | ✓ Enacted | January 4, 2022    | Effective July 1, 2022, Belarus requires non-resident vendors of goods to customers in Belarus to register for and collect VAT if their sales exceed the threshold of EUR 10,000 in a calendar year.  | 38   |
|         | ✓ Enacted | January 18, 2023   | Effective January 1, 2023, Belarusian resident legal entities and individual entrepreneurs must calculate and pay VAT on purchases of goods, works, or services in Belarus from foreign individual entrepreneurs who are not registered with the Belarusian tax authorities.  | 39   |
| Belgium | ✓ Enacted | January 1, 2019    | Effective July 1, 2003, Belgium requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Belgium to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Belgium applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 40   |
|         | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Belgium requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Belgian consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 41   |
|         | ✓ Enacted | January 1, 2020    | Effective January 9, 2020, Belgium introduced new reporting obligations for online platforms. Platforms must provide their business users with a document mentioning: (1) the identity of the user and his tax number or, when the user does not have a tax number, his date of birth, his first and last name, and his full address; (2) the date of the start or end of his activity; (3) the description of the services provided by the user; (4) the gross amount of transactions carried out by the user, broken down if necessary according to the nature of the service provided; and (5) where applicable, the amount and nature of any sums withheld, broken down if necessary according to the nature of the service provided. This documentation must also be submitted to the tax authority by no later than March 31 of the year following the relevant year. | 42   |
|         | ✓ Enacted | August 5, 2022     | On July 22, 2022, the Belgian tax authorities published guidance clarifying the tax treatment of cryptocurrencies and non-fungible tokens (NFTs). With respect to VAT, the tax authorities clarify that cryptocurrency exchange transactions are exempt from VAT. The same applies to the negotiation of a third party within the framework of a contract for the transfer of bitcoins. There is also an exemption on financial transactions involving non-traditional currencies, but only if these currencies are intended solely to be alternative means of payment. However, NFTs are not considered means of payment. They are digital collectibles or digital art objects, which are not VAT exempt. As NFTs should qualify as digital services, they should be taxable in Belgium at the standard VAT rate if the recipient is established in Belgium.               | 43   |



# Taxation of the digitalized economy – indirect taxes










✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country                       | Status     | Latest development | Brief description  | Cite |
|-------------------------------|------------|--------------------|--|------|
|                               | ✓ Enacted  | November 27, 2023  | Effective January 1, 2024, Belgium imposes joint liability on digital platforms for VAT payments in situation where the digital platforms are not considered deemed suppliers for VAT purposes. Digital platforms are required to confirm vendors' VAT identification numbers before facilitating sales and on an annual basis. If the tax authority communicates serious suspicions about a vendor three times, the platform must either exclude the vendor or share liability for unpaid VAT.                                    | 44   |
| <b>Benin</b>                  | ✓ Enacted  | May 4, 2023        | On April 14, 2023, the tax authorities of Benin published Circular N°0426/DC/SGM/DGI/DLC/DCFR which requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Benin to register for and collect VAT, regardless of the sales amount. Taxpayers have six months from the publication of the Circular to register.  | 45   |
| <b>Bhutan</b>                 | ✓ Enacted  | August 11, 2025    | Effective July 1, 2022, Bhutan planned to introduce a new goods and services tax (GST) system, which, among other things, would require non-resident vendors of digital services to consumers (B2C) in Bhutan to register for and collect GST if their sales exceed BTN 5,000,000 in a 12-months period.<br><br>On July 14, 2022, Bhutan announced the postponement of the implementation of the new GST until the IT management for the new tax is ready. The announcement did not include any tentative implementation deadline. | 46   |
|                               | ✓ Enacted  | October 7, 2025    | Bhutan recently confirmed that it will implement a GST regime from January 1, 2026, replacing its sales tax. The GST Amendment Law 2025 sets a five percent standard rate and mandates registration for non-resident providers of imported B2C services above specified thresholds. Electronic services and platforms are covered, with strict invoicing, penalties, and enforcement provisions.   | 47   |
| <b>Bolivia</b>                | ● Proposed | May 7, 2021        | On May 4, 2021, the Chamber of Deputies of Bolivia published draft bill PL No. 164/2020-2021, which would require non-resident digital services providers to register for and collect VAT. If a non-resident digital service provider is not registered for VAT purposes, the bill would allow the tax authorities to require financial intermediaries to withhold VAT.  | 48   |
| <b>Bosnia and Herzegovina</b> | ✓ Enacted  | February 2, 2023   | On February 2, 2023, the tax authority of Bosnia and Herzegovina reminded non-residents of digital services to consumers (B2C) in Bosnia and Herzegovina that they are required to register for and collect VAT.   | 49   |
|                               | ✓ Enacted  | May 7, 2025        | On April 29, 2025, Bosnia & Herzegovina published Amendments and Supplementation of The Rules on The Application of The Value Added Tax Law, which, among other things, clarify that digital services encompass various offerings, including web hosting and remote maintenance, software procurement and updates, access to images, text, information, and databases, procurement of music, films, games, and related services, and organization of distance learning via the Internet.   | 50   |

# Taxation of the digitalized economy – indirect taxes

|  Enacted |   |  Proposed / Announced |                    |  Proposal rejected   |      |
|---|---|--|--------------------|---|------|
| Country   | Status  |  | Latest development | Brief description   | Cite |
|   |    | Enacted  | August 6, 2025     | On August 6, 2025, Bosnia and Herzegovina (BiH) published a notice restating the obligations of non-resident companies providing electronic services to individuals in BiH. Under the VAT Law, such companies must register for VAT through a local tax representative if their taxable gross receipts exceed BAM 100,000 annually or may voluntarily register if below the threshold. Services covered include software, streaming media, online education, advertising, consulting, and telecommunications. The notice emphasizes that BiH is considered the place of taxation for these services and warned that non-compliance will trigger administrative and legal actions. | 51   |
| Botswana  |    | Enacted  | September 18, 2025 | On August 16, 2025, the parliament of Botswana adopted the Value Added Tax (Amendment) Bill No. 22 of 2025, which expands VAT base by introducing VAT on digital services provided by non-residents and applying the VAT self-assessment on sales to registered persons, government entities, or large unregistered persons. Remote services will be deemed provided in Botswana based on factors such as location, billing details, or SIM information. Non-resident providers exceeding BWP 500,000 in annual sales must register for VAT. The effective date is yet to be announced.   | 52   |
| Brazil  |    | Enacted  | January 2, 2017    | Effective January 1, 2017, municipalities in Brazil can impose municipal services tax (ISS) on certain digital services. However, this does not apply to services provided by non-residents.  | 53   |
|   |    | Enacted  | October 19, 2017   | Effective April 1, 2018, Brazil allows states to impose state-level VAT (ICMS) on digital goods, such as apps, e-books, software, games, etc. The tax is paid in the state where the download or streaming is conducted and where the purchasing consumer is located. The rules do not apply to non-residents. In addition, while not all the states have opted to taxing software, Sao Paulo, Paraiba, Goias, Piaui e Rondonia are states that have introduced such rules.   | 54   |
|   |  | Enacted  | February 25, 2021  | In February 2021, the Supreme Court of Brazil (STF) held in binding decisions in ADI 5.659 and ADI 1.945 that only the municipal services tax (ISS) can be levied on software licensing and therefore the state-level VAT (ICMS) cannot be levied on the downloading of software. Businesses that had opted to pay ICMS could not seek refunds, while municipal tax authorities could not claim the unpaid ISS prior to the date of the decision. However, those businesses that had paid both ICMS and ISS could claim back the ICMS. Businesses that had paid neither could be subject to demands from municipalities.  | 55   |
|   |  | Enacted  | August 5, 2022     | In March 2021, the Supreme Court of Brazil (STF) held that State Convention 106/2017, which allowed states to levy ICMS on digital goods, is ineffective as only ISS should be applied to those sales.  | 56   |

# Taxation of the digitalized economy – indirect taxes

| ✓ Enacted  |             | ● Proposed / Announced |  | ✗ Proposal rejected |  |
|------------|-------------|------------------------|--|---------------------|--|
| Country    | Status      | Latest development     | Brief description  | Cite                |  |
|            | ● Proposed  | May 14, 2024           | On April 24, 2024, the Brazilian government proposed a tax reform bill introducing a new dual VAT regime, replacing the current state VAT, municipal tax on services, and federal PIS/COFINS contributions with two harmonized taxes: a tax on goods and services (IBS) and the contribution on goods and services (CBS). For the first time, non-residents conducting taxable transactions in Brazil would have an indirect tax compliance obligation, requiring them to register for, collect, and remit the new taxes. The proposal also introduces a new IBS/CBS liability for transactions conducted through digital platforms, regardless of whether the sellers are Brazilian or non-resident, and whether they are registered for IBS/CBS. The tax reform is currently under review by the Brazilian parliament and could be approved within 2024, with the new regime expected to start in 2026. Further details, including the IBS/CBS obligations of non-residents, are expected in the implementing regulations. | 57                  |  |
| Bulgaria   | ✓ Enacted   | January 1, 2019        | Effective January 1, 2007, Bulgaria requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Bulgaria to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Bulgaria applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 58                  |  |
|            | ✓ Enacted   | July 1, 2021           | Effective July 1, 2021, Bulgaria requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Bulgarian consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 59                  |  |
| Cabo Verde | ● Announced | October 6, 2021        | On October 6, 2021, Cabo Verde announced tax measures in its 2022 state budget which includes a proposal to introduce VAT on e-commerce and digital services transactions provided by non-resident provider.   | 60                  |  |
| Cambodia   | ✓ Enacted   | January 17, 2022       | Effective April 1, 2022, Cambodia requires non-resident vendors of digital services to customers (B2C and B2B) in Cambodia to register for VAT if their sales exceed KHR 250 million in a 12-month period. The concept of digital services is broader as generally understood as it also includes electronic access to professional advice. In addition, while the obligation to register applies to both B2C and B2B sales, non-residents are only required to collect VAT on B2C sales but report both B2C and B2B sales in their VAT returns.   | 61                  |  |
|            | ✓ Enacted   | July 8, 2021           | The Cambodian Ministry of Commerce issued Notification No. 1143 on the requirement to apply for e-commerce licenses or permits. The notification is a reminder that persons or entities that conduct e-commerce businesses in Cambodia are required to obtain a license or permit at the risk of penalties or termination of their business activities in Cambodia. Applications for the license can be submitted electronically or directly with the Commercial Registration Department.  | 62                  |  |

# Taxation of the digitalized economy – indirect taxes

|          |           | ✓ Enacted          | ● Proposed / Announced | ✗ Proposal rejected   |      |
|----------|-----------|--------------------|------------------------|---|------|
| Country  | Status    | Latest development |                        | Brief description   | Cite |
|          | ✓ Enacted | February 20, 2023  |                        | On January 24, 2023, the General Department of Taxation (GDT) issued Instruction No. 2520, which clarifies and add some rules and procedures regarding the VAT rules applicable to non-resident digital services providers. The instruction clarifies that non-resident taxpayers who only have transactions with related parties (e.g., subsidiary or branch) in Cambodia are exempted from simplified VAT registration, but the related party in Cambodia needs to notify the GDT. Moreover, for business-to-business (B2B) transactions, the self-assessment taxpayers who have already filed the monthly tax declaration can amend the VAT amount by using credit notes issued by the non-resident taxpayers. However, VAT credits resulting from this amendment are only deductible against VAT reverse charge.  | 63   |
| Cameroon | ✓ Enacted | January 17, 2020   |                        | Effective January 1, 2020, Cameroon requires non-resident vendors (including online platforms) of goods and services provided in Cameroon through foreign or local e-commerce platforms to register for and collect VAT, regardless of the sales amount.  | 64   |
| Canada   | ✓ Enacted | January 24, 2022   |                        | <p><b>Federal rules</b></p> <p>Effective July 1, 2021, Canada requires the following non-resident vendors to register for and collect the federal GST/HST if their sales exceed CAD 30,000 in a 12-month period:</p> <ol style="list-style-type: none"> <li>1. Non-resident vendors or non-resident distribution platform operators who sell (or facilitate the sale of) taxable digital products or services, such as online music streaming or traditional services, to Canadian consumers (B2C) who are not registered under the normal GST/HST</li> <li>2. Non-resident vendors or non-resident distribution platform operators who sell (or facilitate the sale of) qualifying goods, including goods that are delivered or made available in Canada, such as goods located in a fulfillment warehouse or goods shipped to a purchaser in Canada; and</li> <li>3. Non-resident vendors of taxable short-term accommodation in Canada or accommodation platform operators that facilitate such sales.</li> </ol> <p>On January 24, 2022, the Canadian Revenue Agency published an updated guidance on GST/HST for non-resident businesses, which, among other things, includes clarifications concerning GST/HST changes for businesses in the digital economy that took effect July 1, 2021.</p> | 65   |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         | ✓      | Enacted            | <p><i>Province of Quebec</i></p> <p>Effective January 1, 2019, Quebec requires non-residents selling services and goods to consumers (B2C) in Quebec to register for and collect Quebec sales tax (QST) if their sales exceed CAD 30,000 in a 12-month period.</p> <p>Quebec extended this obligation to Canadian online platforms not registered for QST effective March 1, 2019 and to other Canadian online businesses not QST registered effective September 1, 2019.</p> <p>Effective July 1, 2021, Quebec amended the QST regime to adapt it to the federal GST/HST rules.</p>   | 66   |
|         | ✓      | Enacted            | <p><i>Province of Saskatchewan</i></p> <p>Effective April 1, 2019, Saskatchewan requires out-of-province businesses (including non-residents) making retail sales of taxable goods and services acquired for use or consumption (B2C and B2B) in or relating to Saskatchewan to register for and collect provincial sales tax (PST), regardless of the sales amount.</p> <p>Effective January 1, 2020, Saskatchewan requires out-of-province e-commerce platforms (including electronic distribution platforms and online accommodation platforms) to collect and remit PST on the sales of taxable goods and services they facilitate. In addition, Saskatchewan expanded the list of taxable services on which taxpayers must collect and remit PST. Such services include electronic distribution services that are delivered, streamed, or accessed through an electronic distribution platform (e.g., website, portal, or gateway).</p> | 67   |
|         | ✓      | Enacted            | <p><i>Province of British Columbia</i></p> <p>Effective April 1, 2021, Canadian sellers of goods and non-Canadian sellers of software and telecommunication services to customers in British Columbia (B2C and B2B) are required to register for and collect provincial sales tax (PST) if their sales exceed CAD 10,000 in a 12-month period.</p> <p>Effective July 1, 2022, British Columbia requires marketplace facilitators to register for and collect PST.</p>  | 68   |
|         | ✓      | Enacted            | <p><i>Province of Manitoba</i></p> <p>Effective December 1, 2021, Manitoba requires resident and non-resident online platform operators, providers of streaming services, and online accommodation platforms to register and collect retail sales tax (RST) if the sales exceed CAD 10,000.</p> <p>In December 2021, the finance department of Manitoba issued Information bulletin No. 64 clarifying the new RST obligations applicable to streaming services, online sales platforms, and online accommodation providers.</p>  | 69   |
|         | ✓      | Enacted            | <p><i>Province of Alberta</i></p> <p>Effective April 1, 2022, Alberta requires online marketplaces to collect and remit the tourism levy on behalf of Alberta short-term rental hosts.</p>   | 70   |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country     | Status    | Latest development | Brief description   | Cite |
|-------------|-----------|--------------------|---|------|
|             | ✓ Enacted | March 1, 2023      | <i>Province of British Columbia</i><br>Effective July 1, 2023, British Columbia clarified that online marketplace services are taxable when an online marketplace facilitator provides the online marketplace services to facilitate the sale or provision of non-taxable services.   | 71   |
|             | ✓ Enacted | March 16, 2023     | <i>Province of British Columbia</i><br>On March 10, 2023, the Supreme Court of the Province of British Columbia held in Hootsuite Inc., [2023 BCSC 358], that the cloud computing products at issue are not subject to the provincial sales tax because they do not constitute software programs for use on a computer in the province.   | 72   |
|             | ✓ Enacted | May 10, 2024       | <i>Province of British Columbia</i><br>On April 29, 2024, British Columbia published the 2024: Budget Measures Implementation Act, 2024, which, among other things, retroactively expands the definition of "software" in the Provincial Sales Tax Act from April 1, 2013, to include "infrastructure as a service," "software as a service," application programming interfaces, and the right to receive software modifications or new versions, while also redefining "use" to encompass various ways of accessing the software.   | 73   |
|             | ✓ Enacted | March 26, 2025     | <i>Province of Manitoba</i><br>Effective January 1, 2026, Manitoba retail sales tax applies to cloud computing services, including software subscriptions, data storage, and remote computer processing   | 74   |
|             | ✓ Enacted | June 25, 2025      | <i>Province of British Columbia</i><br>On June 24, 2025, British Columbia updated provincial sales tax (PST) Bulletins 105 and 107 to clarify tax rules for software and telecommunication services. The updates define how to determine if devices are "ordinarily situated" in British Columbia for PST purposes, outline taxable versus exempt services, and introduce rules for incidental software. They also require online marketplace facilitators to register, collect, and remit PST on software and related services for British Columbia-based devices, and confirm carriers' obligations to retain exemption evidence for out-of-province users. | 75   |
| <b>Chad</b> | ✓ Enacted | February 7, 2025   | On January 1, 2025, Chad implemented a series of VAT measures as part of its 2025 Budget. These measures included the requirement for both foreign and local e-commerce platforms to collect and remit VAT on transactions involving sales, services, and goods.  | 76   |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted

● Proposed / Announced

✗ Proposal rejected

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
| Chile   | ✓ Enacted | March 17, 2022     | <p>Effective June 1, 2020, Chile requires non-resident vendors of digital services to consumers (B2C) in Chile to register for and collect VAT, regardless of the sales amount.</p> <p>On June 11, 2020, the tax authority of Chile (SII) issued Circular 42 regulating the imposition of VAT on digital services. The Circular includes the following: (1) a detailed explanation of the digital services in scope of the rules and the taxable events triggering the application of VAT; (2) the geolocation criteria for the establishment of the tax; (3) the interaction between VAT and withholding taxes on digital services; (4) rules on the persons responsible for the withholding and payment of the tax; and (5) details on the registration system.</p> <p>Chile further introduced a new VAT refund procedure for foreign taxpayers subject to the simplified VAT regime for digital services. Taxpayers that mistakenly declare and enter an amount of VAT greater than due may request a refund or imputation of the excess VAT paid by applying via email. In addition, digital service providers may request to modify the tax period and reporting currency once a year, between January 21 and 31 of each year. If the request is accepted, it will take effect on January 1 of that same year.</p> | 77   |
|         | ✓ Enacted | July 28, 2020      | On July 22, 2020, the SII issued Letter No. 1401, clarifying that VAT applies to online platforms where patients are treated by doctors through video calls. The online platform is considered a taxpayer and is subject to VAT on the commission charged to bring patient flows to doctors as an intermediary activity.   | 78   |
|         | ✓ Enacted | August 22, 2020    | On August 21, 2020, the SII issued a Resolution requiring banks to present a quarterly Payment Cards Report identifying each payment to entities not residing or domiciled in Chile. The report must include the international reference number, the date, the name and location of the foreign business, the sum, the currency and equivalence in U.S. dollars, and other details.  | 79   |
|         | ✓ Enacted | April 7, 2021      | On March 25, 2021, the SII published Ruling 778 in which it held that payments made for the right to use software are generally exempt from withholding tax, provided they do not entail the right to commercially exploit the software. Consequently, the acquisition of software licences is subject to VAT. Moreover, the SII explained that the non-resident service provider must register for VAT only if the customer is not registered for VAT. However, if the Chilean entity acquiring the software is subject to VAT, it is required to issue an invoice, file a VAT return, and pay the VAT concerned in Chile.  | 80   |
|         | ✓ Enacted | May 11, 2021       | On April 23, 2021, the SII issued Ruling 1039 in which it held that VAT does not apply to the provision of services consisting in the design, development, and programming of software provided by non-residents.  | 81   |
|         | ✓ Enacted | November 24, 2021  | On November 24, 2021, the Chilean tax authority updated its list detailing the non-resident digital services providers that are non-compliant with the Chilean simplified VAT registration and filing obligations. According to the tax authority, 117 companies are noncompliant. The tax authority has stated that it is considering introducing a tax withholding model in case of continued noncompliance.   | 82   |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
|         | ✓ Enacted | January 13, 2022   | Effective January 1, 2023, Chile applies VAT to all services unless they are explicitly exempt. As services are generally sourced in Chile if provided or used in Chile, non-resident services providers are required to register for, collect, and remit VAT when providing remote services to consumers in Chile.  | 83   |
|         | ✓ Enacted | June 1, 2022       | On May 13, 2022, the SII released Resolution SII N°46/2022, which establishes an official registry or list of non-resident vendors that will be subject to the withholding of the VAT, which are referred to as “ <i>Contribuyentes IVA SD Afectos a Cambio de Sujeto</i> ” (VAT taxpayers without domicile subject to withholding). Accordingly, Chilean financial institutions issuing credit or debit cards, or any other instrument used to transfer payments to listed foreign vendors, will be required to withhold the corresponding VAT. The Resolution further provides that the first list of non-resident vendors subject to VAT withholding, which was published on the SII website on June 1, 2022. Going forward, the tax authority will add new taxpayers to the list annually.   | 84   |
|         | ✓ Enacted | August 19, 2022    | On August 4, 2022, the SII published Ruling No. 2361 in which it clarified that services rendered by a company resident in the United States through an application software that allows investing in dollars by providing financial advice and investment services should not qualify as digital services for VAT purposes.   | 85   |
|         | ✓ Enacted | October 20, 2022   | On October 12, 2022, the SII published Ruling No. 3017 in which it clarified that services performed by a platform facilitating the trading of a crypto currency are subject to VAT.   | 86   |
|         | ✓ Enacted | June 27, 2023      | On April 27, 2023, the Chilean tax authority issued Letter No. 1290T clarifying that digital currency transactions are exempt from VAT as they are intangible. Commissions for intermediaries performing digital currency operations on behalf of third parties are subject to VAT, and invoices must be issued depending on whether the purchaser is a final consumer or a taxpayer.  | 87   |
|         | ✓ Enacted | October 24, 2024   | On October 24, 2024, Chile published the Tax Compliance Bill, which introduces new reporting and VAT collection obligations for platform operators and remote sellers of goods to consumers in Chile. The Bill mandates that digital platform operators verify the tax compliance of entities offering products or services on their platforms and report annually to the tax authority. The Bill also clarifies VAT obligations for digital platforms, deeming the operator a taxpayer for transactions subject to VAT. Furthermore, the Bill clarifies that all remotely provided services are sourced to Chile when the consumer is located in Chile.   | 88   |
|         | ✓ Enacted | May 9, 2025        | On April 30, 2025, the Chilean tax authority issued Circulars 38/2025 and 39/2025 to implement provisions from last year's tax reform, including VAT rules for marketplaces and low-value goods, and marketplace compliance requirements. Effective October 25, 2025, Circular 39/2025 clarifies that online marketplace operators must handle VAT for transactions facilitated through their platforms, depending on the location and tax status of the involved parties. It also details the VAT treatment for transactions involving multiple intermediary platforms and new rules for international sales of low-value goods (not exceeding \$500). Effective October 1, 2025, and January 1, 2026, Circular 38/2025 outlines new compliance requirements for digital platform operators, including reporting obligations and periodic verification of sellers' tax compliance. Further resolutions will provide additional guidance on these obligations. | 89   |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status | Latest development | Brief description  | Cite |
|---------|--------|--------------------|--|------|
|         | ✓      | Enacted            | <p>September 9, 2025</p> <p>Chile's tax authority (Servicio de Impuestos Internos, SII) recently published several resolutions to implement and clarify VAT compliance procedures for non-resident entities selling low-value goods (priced under USD 500) to Chilean consumers, effective October 25, 2025.</p> <p>Resolution No. 84-2025 (July 10, 2025) established VAT registration requirements for non-resident sellers, digital platforms, and drop shipping operators, mandating registration via the Digital VAT Portal and the collection of VAT at a 19 percent rate.</p> <p>Resolution No. 93-2025 (July 30, 2025) outlined a simplified VAT compliance mechanism for cross-border B2C transactions, exempting goods exceeding USD 500 or requiring special import approvals, while placing VAT collection responsibility on marketplace operators unless the buyer or seller is a registered Chilean VAT taxpayer.</p> <p>Resolution No. 99-2025 (August 7, 2025) introduced reporting obligations for digital payment and intermediation platforms, requiring verification of user compliance and submission of user data to the SII by November 30, 2025.</p> <p>A Joint Resolution Ex. SII No. 103-2025 and SNA No. 3507-2025 (August 25, 2025) by the SII and National Customs Office established rules for validating VAT exemptions on low-value imports, requiring sellers to document VAT collection and shipping details to qualify for exemptions.</p> <p>Ruling No. 1688-2025 (August 27, 2025) clarifies that operators do not need to display VAT separately and may show tax-inclusive pricing.</p> | 90   |
|         | ✓      | Enacted            | <p>September 9, 2025</p> <p>On August 27, 2025, Chile's tax authority issued Ruling No. 1679-2025 to clarify VAT on cross-border services (for example, subscriptions, digital services, and consulting) provided to Chilean customers that do not register for VAT. When a Chilean company that is not a VAT taxpayer pays for these services, the foreign provider must register in Chile's simplified VAT system for non-residents (an online portal to charge, file, and pay VAT) and collect and remit VAT; if the provider does not register, the Chilean legal entity can request authorization to withhold and pay the VAT itself using a purchase invoice. The ruling ties VAT to Chile's withholding tax on cross-border payments: VAT applies only when the payment is not subject to withholding tax; if withholding tax applies, the payment is VAT-exempt; however, if a law or a tax treaty exempts withholding tax while the service is used or enjoyed in Chile, VAT still applies.</p>   | 91   |
|         | ✓      | Enacted            | <p>October 16, 2025</p> <p>On October 16, 2025, Chile's tax authority (SII) published Ruling No. 2066-2025, clarifying the VAT treatment of offshore software licensing services. The ruling confirms that such services provided to Chilean entities are subject to VAT under the general rules, regardless of whether the foreign seller contracts directly or through a Chilean intermediary. When the Chilean recipient is a VAT taxpayer, the reverse charge mechanism applies, requiring the local entity to issue a purchase invoice, file the VAT return, and remit the tax directly to the authorities. The foreign seller is thereby relieved of VAT collection obligations.</p>   | 92   |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted

● Proposed / Announced

✗ Proposal rejected

| Country  | Status      | Latest development | Brief description   | Cite |
|----------|-------------|--------------------|---|------|
|          | ✓ Enacted   | October 25, 2025   | Chile's tax authority (SII) recently implemented a series of VAT-related measures affecting the sale of low-value goods into Chile. Under Joint Resolution Ex. SII No. 141-2025 and SNA No. 4260-2025 (dated October 15, 2025), Chilean platform operators must submit shipment-level data to validate VAT exemptions, including tax ID, confirmation of VAT charge, and tracking identifiers. Resolution Ex. SII No. 142-2025 (dated October 16, 2025) removed the exclusion of goods subject to special import taxes from the simplified VAT regime, allowing broader eligibility for goods valued under USD 500. Finally, Resolution Ex. SII No. 145-2025 (dated October 16, 2025) introduced new filing rules requiring domestic platforms to charge 19 percent VAT to Chilean consumers (not VAT taxpayers) purchasing low-value goods from foreign sellers via these platforms. | 93   |
| China    | ✓ Enacted   | April 8, 2016      | Imported retail goods purchased in cross-border e-commerce transactions are subject to import tariff duties, as well as VAT and consumption tax. This rule does not impact non-residents. China is combining duties, VAT, and consumption tax in one tax on e-commerce purchases.   | 94   |
| Colombia | ✓ Enacted   | November 28, 2018  | Effective July 1, 2018, Colombia requires non-resident vendors of digital services to consumers (B2C) in Colombia to register for and collect VAT, regardless of the sales amount.  | 95   |
|          | ✓ Enacted   | August 12, 2019    | According to Resolution No. 000049, non-resident service providers may opt to have VAT withheld directly at source on payments for their digital services by issuers of credit and debit cards, the sellers of prepaid cards, and other intermediaries facilitating payment for digital or electronic services instead of collecting VAT from customers.  | 96   |
|          | ✓ Enacted   | April 7, 2021      | On February 5, 2021, the Colombian tax authority published Ruling 900918 in which it held that concerts provided via digital platforms do not qualify for the VAT exemption for public performances.  | 97   |
|          | ✓ Enacted   | November 7, 2023   | On October 17, 2023, the Colombian tax authority issued General Tax Ruling 1621 of 2023, which clarified the tax treatment of crypto assets, including cryptocurrencies and non-fungible tokens (NFTs). These assets are categorized as intangible, and their value can be included in tax calculations. Regarding the applicable VAT treatment, the ruling clarifies that while the sale of crypto assets is not subject to VAT unless the asset is related to industrial property, services related to crypto assets, such as intermediation services or cryptographic mining, are indeed subject to VAT.   | 98   |
|          | ● Announced | January 30, 2025   | The Ministry of Finance of Colombia recently announced plans to apply 19 percent VAT on online gambling.  | 99   |
|          | ✓ Enacted   | October 14, 2025   | On October 14, 2025, Colombia's Constitutional Court published Decision No. C-431, validating the emergency tax measures introduced under Executive Decree No. 175-2025 during the state of internal unrest. The decree imposes temporary taxes, including VAT on online gambling. The Court upheld the constitutionality of these measures, provided that the revenue is exclusively allocated to specific public sector budget items such as health, education, and defense. If collections exceed the authorized budgetary needs, taxpayers may request refunds or offsets within five years.  | 100  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country                    | Status    | Latest development | Brief description   | Cite |
|----------------------------|-----------|--------------------|---|------|
| <b>Congo (Republic of)</b> | ✓ Enacted | February 27, 2024  | Effective January 1, 2024, the Republic of Congo requires non-resident vendors of digital services to customers (B2C and B2B) in the Republic of Congo to register for and collect VAT, regardless of the sales amount. The tax authorities have yet to publish details on the compliance mechanism, including a registration portal.   | 101  |
| <b>Costa Rica</b>          | ✓ Enacted | September 29, 2020 | On July 1, 2019, Costa Rica implemented a new VAT system, which includes provisions on the sale of digital services by non-residents to customers in Costa Rica.<br><br>Effective August 1, 2020, the general tax administration (DGT) established a list of non-resident vendors that are subject to the VAT on their sales of digital services made to consumers (B2C) in Costa Rica, regardless of the sales amount. Non-resident providers that are not part of the list are not subject to this mechanism for the moment. The DGT established two mechanisms to collect the VAT of those platforms: registration by non-resident digital services provider or withholding by credit and debit card issuers effective October 1, 2020.<br><br>On September 22, 2020, the DGT issued guidance DGT-R-27-2020 providing adjustments to the original guidance regarding the collection of VAT on cross-border digital services. Changes include: (1) the requirement to collect VAT on purchases of international digital services is to be performed once the transaction is recorded on the card holder's credit or debit balance; (2) card issuers must comply with a new requirement to prepare and provide a transaction report to the tax authority three times a year; and (3) amendments to appendix N°6 that lists the names of digital service providers and entities that are subject to the VAT collection rules. | 102  |
|                            | ✓ Enacted | December 18, 2020  | On December 15, 2020, the DGT issued Resolution DGT-R-42-2020 clarifying the rules regarding the VAT obligations for non-resident providers and intermediaries of cross-border digital services. According to the Resolution, the tax authority will update on its official website the list of cross-border services providers and intermediaries of cross-border digital services. In addition, the tax authority provided detailed information on the format and procedure for complying with the obligation to file a report on e-commerce transactions carried out quarterly that were not subject to VAT withholding. Such report is due on the last working day of May, September, and January.  | 103  |
|                            | ✓ Enacted | July 16, 2021      | On July 16, 2021, the DGT published Resolution DGT-R-23-2021, which establishes the procedure for taxpayers to request a refund of VAT paid incorrectly on cross-border digital services. The refund procedure applies where a Costa Rican customer purchases an in-scope digital service from a non-resident digital service provider and the financial intermediary withheld the VAT, but the service is not consumed in Costa Rica.  | 104  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country | Status     | Latest development | Brief description  | Cite |
|---------|------------|--------------------|--|------|
| Croatia | ✓ Enacted  | October 27, 2022   | On July 22, 2021, Costa Rica published an updated list of non-resident digital service providers for which financial intermediaries are required to withhold VAT on purchases made by Costa Rican customers.<br><br>Effective November 1, 2022, Costa Rica published an updated list of non-resident digital service providers for which financial intermediaries are required to withhold VAT on purchases made by Costa Rican customers, including certain accommodation platforms. The list includes now 136 providers of digital services. | 105  |
|         | ● Proposed | November 15, 2022  | The parliament of Costa Rica recently accepted for consideration Draft Bill 23415, which, if approved, would, among other things, (1) exclude from VAT acquisitions (including mining and airdrops), custodies or transfers of crypto assets provided the transaction does not represent a transfer of goods and services in the Costa Rican territory; (2) deem the use of crypto assets as private virtual currency and thus as exempt financial services; and (3) clarify that crypto asset operations do not give a right to VAT credits.  | 106  |
|         | ✓ Enacted  | June 6, 2023       | Effective June 1, 2023, the tax authority of Costa Rica updated its list of cross-border digital service providers and intermediaries. The list lets local financial intermediaries know when to withhold VAT when consumers purchase digital services from non-resident providers. The list now includes 148 providers and intermediaries.  | 107  |
|         | ✓ Enacted  | October 1, 2023    | On October 1, 2023, Costa Rica published an updated list of foreign providers of digital services that are subject to withholding by financial institutions. The list now includes 156 providers and intermediaries.   | 108  |
|         | ✓ Enacted  | January 1, 2019    | Effective January 1, 2013, Croatia requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Croatia to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Croatia applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.                                  | 109  |
|         | ✓ Enacted  | July 1, 2021       | Effective July 1, 2021, Croatia requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Croatian consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 110  |
| Cyprus  | ✓ Enacted  | January 1, 2019    | Effective May 1, 2004, Cyprus requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Cyprus to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Cyprus applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 111  |
|         | ✓ Enacted  | July 1, 2021       | Effective July 1, 2021, Cyprus requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Cypriot consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 112  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
| Czechia | ✓ Enacted | January 1, 2019    | Effective May 1, 2004, Czechia requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Czechia to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Czechia applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 113  |
|         | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Czechia requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Czech consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 114  |
| Denmark | ✓ Enacted | January 1, 2019    | Effective July 1, 2003, Denmark requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Denmark to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Denmark applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 115  |
|         | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Denmark requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Danish consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 116  |
|         | ✓ Enacted | December 13, 2022  | The Danish tax authority clarified that the provision of rights to crypto-art is not an alternative means of payment to legal tender. Therefore, the VAT exemption for financial services does not apply when crypto-art is acquired exclusively with virtual currency as consideration. The tax authority further held that such a sale does not benefit from a concession for the first sale of art produced by a taxpayer personally. Finally, the tax authority clarified that it has not taken a position on whether the sale of crypto-art is a VAT-exempt artistic performance.   | 117  |
|         | ✓ Enacted | March 6, 2023      | On March 3, 2023, the Danish Council published Binding Answer No 22-0757927 in which it held that the sale of virtual gambling coins does not fall within the scope of the VAT exemption relating to currency, bank notes, and coins used as legal tender.   | 118  |
|         | ✓ Enacted | July 7, 2023       | On July 7, 2023, Denmark's tax authority published Tax Council Binding Answer No.SKM2023.329.SR, which clarifies the VAT treatment applicable to nonfungible tokens (NFTs) transactions related to digital art. In this situation, a taxpayer sold and rented crypto-art images as NFTs on digital platforms, receiving digital currency in return. The Tax Council confirmed that the taxpayer qualified as a taxable person under the VAT Act. However, the Act exempts artistic activities from taxation. As a result, the individual's planned sale and rental of crypto-art on the trading platforms was exempt from VAT. | 119  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country            | Status                               | Latest development            | Brief description   | Cite |
|--------------------|--------------------------------------|-------------------------------|---|------|
|                    | <span style="color: blue;">●</span>  | Announced<br>August 16, 2024  | The Danish Tax Agency (DTA) recently announced it is expanding its use of payment information from financial intermediaries to conduct VAT audits on companies selling goods or services to Danish customers. This practice, which has been successful in previous VAT audits, will now extend to other tax areas, including combating the "black economy." The DTA obtains this payment data based on a license granted by the Danish National Tax Board, allowing it to collect payment information from financial institutions. The data helps the DTA identify online purchases made by Danish customers using credit cards and calculate potential VAT due.  | 120  |
|                    | <span style="color: green;">✓</span> | Enacted<br>June 2, 2025       | On June 2, 2025, Denmark's National Tax Court issued Decision No. SKM2025.297.LSR, ruling that a student who bought and resold video game "skins" was not engaged in an economic activity subject to VAT under Danish law. The court determined that the transactions were made as a private individual for personal gameplay purposes, with resale prices roughly equal to purchase costs, showing no profit motive or business intent. The activity was driven by personal interest in enhancing the gaming experience rather than a commercial purpose, exempting the student from VAT obligations.  | 121  |
|                    | <span style="color: green;">✓</span> | Enacted<br>June 26, 2025      | On June 26, 2025, Denmark's Customs and Tax Administration issued Tax Council Binding Answer No. SKM2025.359.SR, clarifying the VAT treatment for a non-EU-based company providing access to a marketing platform via API integration software. The Tax Council determined that the company was not an intermediary for goods or services marketed through the platform, as individual businesses handled delivery, sales terms, and payment conditions. Since the service was provided to Danish business customers, the place of delivery was Denmark, making the service subject to Danish VAT. However, under the VAT self-assessment mechanism, the Danish business customers, not the non-EU company, were responsible for paying VAT on the service. | 122  |
| Dominican Republic | <span style="color: green;">✓</span> | Enacted<br>September 15, 2021 | On July 19, 2021, the tax authority of the Dominican Republic (DGII) issued Public Ruling G.L. Núm. 24434 (GLN 24434) clarifying that sales of intangible digital assets, such as domain name registration, leasing of server space (located outside of the Dominican Republic), file transfer services, and SSL certificates, among others, are not subject to VAT in the Dominican Republic provided that the supply is not bundled and sold together with tangible property.<br><br>On September 15, 2021, the DGII clarified that online sales of e-books are exempt from VAT if the content of the e-book is of a scientific, artistic, or cultural nature.  | 123  |
|                    | <span style="color: blue;">●</span>  | Announced<br>October 18, 2022 | The Dominican Republic recently launched a consultation on proposals to require foreign suppliers to register for, collect, and remit VAT on digital services rendered to consumers in the Dominican Republic.<br><br>On September 29, 2022, the Dominican Republic Ministry of Finance announced the submission of the Draft Law for General State Budget 2023 to the National Congress, which, among other things, includes a proposal to apply VAT on the provision of digital services in the Dominican Republic by non-resident providers.   | 124  |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status     | Latest development | Brief description   | Cite |
|---------|------------|--------------------|---|------|
| Ecuador | ✓ Enacted  | November 16, 2020  | <p>Effective September 16, 2020, Ecuador levies VAT on digital services provided by non-residents to consumers in Ecuador. Ecuadorian credit or debit card providers are adding and withholding the VAT amount when the user pays for the digital services. Alternatively, non-resident digital services providers can opt to register for, collect, and remit VAT.</p> <p>On August 22, 2020, Ecuador published Resolution No. NAC-DGERCGC20-00000053, which establishes rules for the withholding, declaration, and payment of VAT on the import of digital services provided by non-residents to residents or permanent establishments of non-residents in Ecuador.</p> <p>On September 4, 2020, Ecuador published Resolution No. NAC-DGERCGC20-00000055, which establishes rules for registration, declaration, and payment of VAT by non-resident providers of digital services.</p> <p>On September 29, 2020, Ecuador published Resolution No. NAC-DGERCGC20-00000061, which establishes new rules for withholding at source for VAT purposes. The new resolution replaces Resolution No. NAC-DGERCGC15-00000284 of 2015, including new provisions in relation to withholding of VAT on the import of digital services.</p> | 125  |
|         | ✓ Enacted  | June 8, 2021       | On May 28, 2021, the tax authority of Ecuador published Resolution NAC-DGERCGC21-00000026 clarifying the income tax and VAT implications for payments made to, and received from, payment aggregators, and online marketplaces. The Resolution defines a "payment aggregator" as any entity that provides as a service the processing of physical or online payments made to affiliated businesses while it defines "online marketplace" as any entity registered to host buyers and affiliated businesses through technological platforms (intermediary services).   | 126  |
|         | ✓ Enacted  | August 4, 2022     | On July 21, 2022, the tax authority of Ecuador published Resolution NAC-DGERCGC22-00000035 amending the requirements to qualify as a payment aggregator or online marketplace, which are not subject to withholding income tax and VAT on payments received from the financial sector. According to the Resolution, payment aggregators must present an application to the tax authority through its online portal, obtain authorization from the Central Bank, and qualify as a special taxpayer or withholding agents by the SRI. In addition, online marketplaces must be a company incorporated in Ecuador, have in the company's articles of incorporation the activities engaged in as an online market; register in the Single Registry of Taxpayers; apply to the tax authority; qualify as special taxpayers or withholding agents, and not partake in any simplified tax regime or tax regimes under single income tax.   | 127  |
|         | ● Proposed | November 29, 2022  | On November 23, 2022, the parliament of Ecuador accepted a for consideration a bill, which, if approved, would exempt from VAT digital services endorsed by the tax authority that are utilized for the development, pre-production, production, post-production and distribution of national audio-visual content.   | 128  |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted

● Proposed / Announced

✗ Proposal rejected

| Country  | Status      | Latest development | Brief description  | Cite |
|----------|-------------|--------------------|--|------|
|          | ✓ Enacted   | January 20, 2023   | On December 29, 2023, Ecuador published Resolution NAC-DGERCGC22-00000059 amending Resolution NAC-DGERCGC21-00000026 effective January 1, 2023. According to the amendments, financial entities and credit card issuers that are non-withholding tax agents are required to issue withholding tax receipts on the payments made to payment aggregators and online markets showing that no withholding tax has applied in the payment. In addition, online marketplaces are no longer prohibited from being included in any simplified tax regime or tax regimes under single income tax to qualify under the withholding tax regime. | 129  |
|          | ✓ Enacted   | October 15, 2023   | In October 2023, Ecuador published an updated list of foreign providers of digital services that are subject to withholding by financial institutions.   | 130  |
| Egypt    | ● Announced | September 25, 2021 | On September 25, 2021, the Egyptian tax authority announced that individuals engaged in content creation activity such as bloggers and youtubers must register for VAT when their revenues from these activities reaches EGP 500,000 in a twelve-month period  | 131  |
|          | ✓ Enacted   | January 27, 2022   | On January 27, 2022, Egypt amended its VAT law, which, among other things, includes the introduction of a new simplified reporting requirements for non-resident digital services providers and sellers of goods.  | 132  |
|          | ✓ Enacted   | March 28, 2023     | On January 12, 2022, Egypt published executive regulations and on March 22, 2023, guidelines clarifying the VAT obligations for non-residents.<br><br>Effective June 22, 2023, Egypt requires non-residents (including online platforms) providing remote services, including digital services, to consumers (B2C) in Egypt to register for and collect GST if their sales exceed EGP 500,000 in a 12-month period. However, the registration threshold is not applicable for services subject to a reduced VAT rate (e.g., professional and consultancy services).  | 133  |
| Estonia  | ✓ Enacted   | January 1, 2019    | Effective May 1, 2004, Estonia requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Estonia to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Estonia applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 134  |
|          | ✓ Enacted   | July 1, 2021       | Effective July 1, 2021, Estonia requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Estonian consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 135  |
| Ethiopia | ✓ Enacted   | October 2, 2024    | In July 2024, Ethiopia's House of Peoples' Representatives approved Proclamation No. 1341/2024 requiring non-residents (including online platforms) providing digital services to consumers (B2C) in Ethiopia to register for and collect VAT if their sales exceed ETB 2,000,000 in any 12-month period.  | 136  |



# Taxation of the digitalized economy – indirect taxes

|                |           | ✓ Enacted | ● Proposed / Announced | ✗ Proposal rejected  |      |  |
|----------------|-----------|-----------|------------------------|--|------|--|
| Country        | Status    |           | Latest development     | Brief description  | Cite |  |
|                | ✓ Enacted |           | July 11, 2025          | Ethiopia recently issued updated VAT rules requiring non-resident digital service providers offering electronic goods, services, or platforms to Ethiopian individuals to register for VAT unless operating through a VAT-registered agent. Taxable services include digital content, mobile apps, cloud services, subscription media, and other electronic activities. Non-resident providers must register online, receive a VAT number, issue e-invoices with detailed information, and file VAT returns electronically monthly or quarterly. Payments must be made electronically in approved foreign currencies, with late filings potentially revoking quarterly filing privileges.  | 137  |  |
| European Union | ✓ Enacted |           | May 7, 2002            | Effective July 1, 2003, the EU changed the sourcing rules for charging VAT on the sale of digital services provided by non-EU businesses to final EU consumers. These services are taxed in the country where the customer resides rather than where the vendor is located. Consequently, non-EU vendors are required to register for, collect, and remit VAT in the EU.   | 138  |  |
|                | ✓ Enacted |           | July 13, 2010          | Effective January 1, 2015, the 2003 rules for non-EU vendors are expanded to EU-vendors and to telecommunications and broadcasting services. Therefore, non-resident vendors of digital services to consumers in EU Member States are required to register for and collect VAT. The new rules introduce a simplified EU-wide compliance mechanism: the Mini-One-Stop-Shop.   | 139  |  |
|                | ✓ Enacted |           | December 5, 2017       | Effective January 1, 2019, the EU implemented the following amendments to the EU VAT digital services rules:<br>a) Simplify administrative requirements for EU businesses with revenues below EUR 100,000 to allow them to determine the customer location based on one geolocation evidence instead of two. This simplification does not apply to non-EU businesses.<br>b) Introduce a EUR 10,000 EU-wide threshold for EU companies to be subject to destination sourcing rules for digital services. This simplification does not apply to non-EU businesses.<br>c) Allow non-EU business selling B2C e-services with a VAT registration in the EU to use the Non-Union Mini One Stop Shop (MOSS) mechanism (currently such businesses are required to register for VAT purposes in each EU Member State where their consumers are established).<br>d) Clarify that the invoicing rules of Member State of identification under MOSS apply (rather than the invoicing rules where the consumer is located). | 140  |  |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted
● Proposed / Announced
✗ Proposal rejected

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
|         | ✓ Enacted | October 1, 2020    | <p>Effective July 1, 2021, the EU introduced the following amendments to its VAT rules aimed at e-commerce businesses:</p> <ul style="list-style-type: none"> <li>Extend the scope of the One Stop Shop (OSS) EU-wide compliance mechanism to all B2C services (e.g., events).</li> <li>For intra-EU B2C sales of goods, modify the sourcing country from the ship from to the ship to country if the total sales exceed EUR 10,000 EU-wide in a 12-month period. In addition, for intra-EU B2C sales of goods facilitated by marketplaces for non-EU businesses, the marketplace is liable to register for and collect VAT. The same marketplace liability does not apply to sales facilitated for EU businesses. Taxpayers can leverage an OSS EU-wide mechanism to comply with these rules.</li> <li>For consignments of goods below EUR 150 sold from outside the EU to consumers in the EU, the EU repealed the low value consignment relief mechanism and requires vendors and marketplaces facilitating these sales to register for and collect VAT. Taxpayers can leverage a new OSS EU-wide mechanism to comply with these rules (the IOSS).</li> </ul> <p>On February 13, 2020, the EU published in the official journal Commission Implementing Regulation (EU) 2020/194, which identifies the information required for purposes of registering under the non-EU OSS, the EU OSS, and the IOSS (both for the situation where the supplier and where the intermediary is liable for the compliance obligations) for purposes of the EU e-commerce package, which will be effective January 1, 2021.</p> <p>On October 1, 2020, the European Commission published detailed guidance on the new VAT e-commerce rules that are effective July 1, 2021. The guidance discusses the following: (1) conditions under which an online marketplace operator become liable for reporting and paying VAT; (2) additional recordkeeping obligations for online marketplace operators; (3) the changes to the EU B2C distance sale of goods rules; (4) the changes to the B2C importation of low-value goods; and (5) the changes to the compliance obligations, such as invoicing or appointing a tax representative.</p> | 141  |
|         | ✓ Enacted | January 17, 2020   | <p>On January 15, 2020, the European Union published in the official journal Commission Implementing Regulation (EU) 2020/21, which expands the information provided on the European Commission's portal, including information for distance sales of goods and B2C supplies of services.</p>  | 142  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status | Latest development | Brief description   | Cite |
|---------|--------|--------------------|---|------|
|         | ✓      | Enacted            | <p>On February 7, 2020, the Council of the European Union adopted a Directive implementing rules for the exchange of VAT payment data to aid the detection of VAT fraud in the digital economy, which introduces payment service provider (PSP) record keeping requirements for cross-border e-commerce transactions effective January 1, 2024.</p> <p>On April 6, 2022, the European Union published an implementing regulation, which provides guidance for payment service providers for reporting payment data in a harmonized format; sets out the main function of the EU central database, the Central Electronic System of Payment (CESOP); and lists the responsibilities of the European Commission and EU Member States regarding the management of the system, access to the data, and security and personal data protection.</p> <p>On September 12, 2022, the European Union published Commission Implementing Regulation (EU) 2022/1504 establishing the detailed rules for the implementation of the CESOP to centralise the data gathered by PSPs.</p> | 143  |
|         | ●      | Announced          | <p>The European Commission recently published a report from the EU VAT Expert Group discussing the VAT treatment applicable to the platform economy. The report focuses on the nature and the sourcing of transactions, carried out by platforms. The role of the platforms in the VAT collection mechanism is also discussed (an educational role, the joint liability, the withholding of tax, and the deemed supplier role) as well as the reporting obligations of the platforms and the deemed supplier model. The report further proposes issues to consider in the future when refining the platform economy, inter alia: the conditions to obtain a VAT number harmonized across the EU, the nature of the service fee charged by the platforms, record keeping/data sharing and the joint or several liability or withholding role of the platforms.</p>   | 144  |
|         | ✓      | Enacted            | <p>On April 6, 2022, the EU published Council Directive (EU) 2022/542, which among other things, amends the sourcing rules for live streaming and similar services from the place where the service is performed to the place where the consumer is located effective January 1, 2025.</p>  | 145  |
|         | ●      | Announced          | <p>The EU Commission published working papers from the EU VAT Committee meeting on March 28, 2022, which discuss, among other things, the VAT treatment of crypto-assets and e-wallets.</p>   | 146  |
|         | ●      | Announced          | <p>Following its meeting on June 10, 2022, the EU's VAT Expert Group (VEG), released a working paper on the VAT treatment of the platform economy, which discusses the following: (1) the deemed vendor regime and the special mechanism for small enterprises that will come into application in January 2025; (2) the consequences of the platform becoming the deemed vendor in order to identify the customer (the person receiving the underlying service) to know whether the customer is a taxpayer or not; (3) whether a gross receipts threshold (usually related to small enterprises) should apply to platforms themselves and whether their sales count towards the threshold of the vendor, the platform, or both; (4) the special mechanism for travel agents and how it relates to the deemed vendor model; (5) the VAT exemption for short-term accommodation rental; and (6) the relationship between the deemed vendor model and the record keeping obligations.</p>  | 147  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status      | Latest development | Brief description  | Cite |
|---------|-------------|--------------------|--|------|
|         | ✓ Enacted   | February 28, 2023  | On February 28, 2023, the Court of Justice of the European Union (ECJ) published its judgment in <i>Fenix International</i> , Case C-695/20, in which it held that the implementation of the deemed buy-sell rules for intermediaries in digital services (e.g., digital platforms) through an Implementing Regulation rather than through a Directive is valid.   | 148  |
|         | ● Announced | March 23, 2023     | On March 21, 2023, the European Commission (published Working Paper 1060 of the VAT Committee regarding an EC question on non-fungible tokens (NFTs). The Working Paper is the first EU-wide policy document on the potential VAT treatment of NFTs, including NFT minting, NFT trading, and NFTs earned for free.   | 149  |
|         | ● Announced | July 6, 2023       | The European Parliament recently issued four draft reports containing suggested amendments to the European Commission's proposals for the VAT in the Digital Age initiative. The Members of the European Parliament made over 300 suggestions for amendments, including preserving domestic reporting requirements for domestic transactions, extending the deadline for issuing electronic invoices for cross-border transactions, changing the threshold for uninterrupted rental of accommodation, making the European Standard for e-invoices optional, postponing the entry into force of the proposed provisions, securing confidential access to data from the "central VIES," and establishing close cooperation between Member States' authorities, EUROFISC officials, OLAF, and EPPO. | 150  |
|         | ● Proposed  | November 21, 2023  | On November 21, 2023, the VAT Committee of the European Commission discussed in Working Paper 1070 the potential VAT implications of trading in-game items like "skins". This discussion was prompted by Denmark's questions about VAT treatment for non-fungible tokens (NFTs). The paper considers whether individuals regularly trading these items with the intent to earn income should be considered taxable persons for VAT purposes, despite challenges in meeting typical VAT requirements and the digital nature of these assets.  | 151  |
|         | ✓ Enacted   | April 29, 2024     | On March 4, 2024, the European Commission (EC) released VAT Committee Working Paper 1080, examining the VAT implications of "crypto art," a digital art form leveraging blockchain technology. The paper explored whether crypto art trading could be deemed a taxable digital service or potentially exempted as a financial transaction. It also considered the applicability of the special regime for artwork sales, including the margin mechanism or a reduced VAT rate, or exemption as artist-provided services. The paper concluded that crypto art does not qualify for the VAT exemption for financial services, the special regimes for artwork, or the exemption for artist-provided services, due to its intangible nature and its broader uses beyond payment.                    | 152  |
|         | ● Announced | September 2, 2024  | On July 2, 2024, the Tax Disputes Commission of Lithuania lodged a request for a preliminary ruling to the Court of Justice of the European Union (ECJ). Case C-472/24, <i>Žaidimų valiuta</i> . The dispute involves whether the sale of "Gold" in a computer game is subject to VAT. The applicant argues it should be exempt as either a virtual currency or a multi-purpose voucher, while the Lithuanian tax authority disagrees. The Tax Disputes Commission has asked the European Court of Justice to rule on: 1) if the sale of in-game Gold is a VAT-exempt financial transaction under the EU VAT Directive, and 2) if not, how its taxable value should be determined.   | 153  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country | Status     | Latest development | Brief description   | Cite |
|---------|------------|--------------------|---|------|
|         | ✓ Enacted  | March 11, 2025     | On March 11, 2025, the EU adopted the VAT in the Digital Age (ViDA) proposal, which seeks to update the EU's VAT system with three main components: e-invoicing and digital reporting, platform economy, and single VAT registration. The e-invoicing initiative will mandate structured e-invoices for all domestic and cross-border B2B and B2G sales, with full harmonization expected by January 1, 2035. The platform economy component will treat digital platforms as the "deemed seller" for VAT purposes for certain services starting July 1, 2028, with flexibility for Member States to delay implementation until 2030 and exemptions for SMEs under certain conditions. The single VAT registration aims to simplify VAT obligations for traders across Member States, extending the One Stop Shop regime and introducing a new module for reporting intra-EU movements of goods, effective mainly from July 1, 2028. | 154  |
|         | ✓ Enacted  | July 25, 2025      | On July 25, 2025, the European Union adopted Council Directive (EU) 2025/1539 to modernize VAT rules for distance sales of imported goods, focusing on cross-border e-commerce. Under the Directive, import VAT for goods qualifying under the Import One-Stop Shop (IOSS) regime will be the responsibility of the supplier or deemed supplier, such as online platforms, if they have not registered for VAT under the IOSS. Member States may require non-EU sellers to appoint tax representatives and hold them or third parties jointly liable for VAT if no mutual assistance agreement exists. The Directive takes effect 20 days after publication, with implementation required by July 1, 2028.  | 155  |
|         | ● Proposed | September 12, 2025 | On September 11, 2025, the CJEU published the Advocate General's nonbinding opinion in <i>Žaidimų valiuta MB</i> (C-472/24), recommending that traders treat sales of in-game currencies as taxable digital services. The opinion rejects the application of the financial services exemption because in-game gold does not function as legal tender in real transactions (unlike Bitcoin in <i>Hedqvist</i> ) and rejects voucher treatment because the currency neither identifies specific goods or vendors nor obligates acceptance and instead delivers immediate in-game benefits. It adds that the second-hand goods margin mechanism generally covers only tangible items but leaves a narrow, court-tested path to apply a margin-scheme by analogy if the service trades like second-hand goods and residual VAT exists in the chain.   | 156  |
|         | ✓ Enacted  | October 09, 2025   | On October 9, 2025, the CJEU ruled in <i>Xyrality</i> (Case C101/24) that electronic marketplaces can qualify as undisclosed agents under Article 28 of the EU VAT Directive, even before 2015 amendments. This creates two separate transactions: (1) a sale from the developer to the platform and (2) a sale from the platform to the customer.  | 157  |
| Fiji    | ● Proposed | August 9, 2022     | The Fiji Revenue and Customs Service published a draft VAT bill, which, if enacted, would replace the existing VAT Act. The draft bill would, among other things, require non-resident vendors of digital services to consumers in Fiji to register for and collect VAT.  | 158  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
| Finland | ✓ Enacted | January 1, 2019    | Effective July 1, 2003, Finland requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Finland to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Finland applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 159  |
|         | ✓ Enacted | July 1, 2019       | Effective July 1, 2019, Finland applies the reduced 10 percent VAT rate to electronic publications, including books, newspapers, and magazines.  | 160  |
|         | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Finland requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to French consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 161  |
| France  | ✓ Enacted | January 1, 2019    | Effective July 1, 2003, France requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in France to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, France applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 162  |
|         | ✓ Enacted | December 23, 2018  | Effective January 1, 2020, France introduced a reporting requirement for online platforms (i.e., information on sales carried out through platforms to French customers).<br><br>France subsequently expanded the scope of data that online platforms must communicate to the French tax authorities to include French taxable gross receipts relating to transactions engaged in the users of the online platforms. The new data requirements are applicable to transactions performed through online marketplaces effective January 1, 2020.   | 163  |
|         | ✓ Enacted | August 5, 2019     | The French tax authority recently issued a guidance clarifying the VAT treatment applicable to the public offering of digital currency.  | 164  |
|         | ✓ Enacted | December 21, 2020  | On December 11, 2020, the French high administrative court (“Conseil d’Etat”) issued its decision in <i>ValueClick International Ltd.</i> , which addresses the French concept of permanent establishment (PE) both for corporate income tax and VAT purposes. With regards to VAT, the Court of Justice for the European Union (CJEU) expressed on several occasions that it was necessary for the establishment to have enough technical and human resources to provide a service. These two elements are necessary to recognize the existence of a PE for VAT. However, the Conseil d’Etat specified in its decision that the fact of not having technical resources did not preclude the recognition of a PE, insofar as this condition was not relevant for companies in the digital sector because they basically can locate their technical means wherever they want. | 165  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country                 | Status      | Latest development | Brief description  | Cite |
|-------------------------|-------------|--------------------|--|------|
|                         | ✓ Enacted   | July 1, 2021       | Effective July 1, 2021, France requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to French consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 166  |
|                         | ✓ Enacted   | December 29, 2023  | On December 29, 2023, France published the 2024 Finance Act, which, among other things extends a pilot program for two more years that allows tax and customs administrations to detect fraud through data collection from online platforms. It also seeks to expand the data collected and the offenses targeted. The Act further empowers authorized public finance agents to conduct undercover investigations for severe offenses. Finally, the Act introduces a digital injunction to combat fraudulent practices, enabling the removal of websites belonging to non-EU companies that provide services and sell intangible goods online to French consumers without paying VAT.  | 167  |
|                         | ✓ Enacted   | February 16, 2024  | On February 14, 2024, the French tax authority issued a public ruling clarifying that non-fungible tokens (NFTs) are not subject to specific VAT regulations but instead should follow usual principles and rules, with VAT application varying based on whether the NFT represents digital collectible cards, digital graphic works, or is used for video game financing, and depending on the level of human intervention in the creation process and the nature of goods or services they represent.  | 168  |
|                         | ● Announced | May 8, 2025        | On April 29, 2025, the French Ministry of Finance unveiled an e-commerce enforcement action plan designed to enhance oversight and combat VAT fraud. The plan includes increasing controls on foreign e-commerce platforms, ensuring equal scrutiny for both small and large entities, to address the imbalance between European and non-European operators. It also aims to prevent VAT fraud by identifying high-risk operators early and deregistering importers and fiscal representatives who fail to meet record presentation or solvency requirements. Additionally, France will advocate for ending the European Union's exemption of customs duties on parcels valued under EUR 150, as part of the Customs Union reform. | 169  |
| <b>French Polynesia</b> | ✓ Enacted   | October 23, 2020   | Effective January 1, 2010, French Polynesia requires non-resident providers of remote services to customers (B2B and B2C) in French Polynesia to register for, collect, and remit VAT, regardless of the sales amount.   | 170  |
| <b>Gabon</b>            | ✓ Enacted   | August 11, 2021    | On August 11, 2021, Gabon published amendments to its VAT law that include measures to impose VAT on sales of goods or provision of services in Gabon through foreign platforms. The tax authorities have yet to issue implementing regulations.   | 171  |
| <b>Georgia</b>          | ✓ Enacted   | July 30, 2021      | Effective October 1, 2021, Georgia requires non-resident vendors of digital services to consumers (B2C) in Georgia to register for and collect VAT, regardless of the sales amount.  | 172  |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
| Germany | ✓ Enacted | January 1, 2019    | Effective July 1, 2003, Germany requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Germany to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Germany applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 173  |
|         | ✓ Enacted | September 29, 2020 | Effective January 1, 2019, Germany introduced a reporting requirement for online platforms (i.e., information on supplies carried out through platforms to German customers). Under certain conditions, online platforms are held jointly and severally liable for B2C sales of goods performed via their system.<br><br>The German Ministry of Finance published Guidance Letters 2019/858190, 2019/0858465 and 2019/0858488 explaining the VAT obligations for online marketplace facilitators. The German Ministry of Finance reminds marketplace facilitators that they can be held liable under certain conditions for the unpaid VAT resulting from the delivery of items from entrepreneurs legally justified on the marketplace provided by them. Facilitators must use due diligence, including tax office records/correspondence and requesting VAT registration certificates to determine their liability obligations for each vendor registered on their marketplace. Finally, the Guidance Letters include forms for letters from the tax authorities to entrepreneurs rejecting a VAT registration certificate and to marketplace facilitators warning against VAT liability.<br><br>On September 2, 2020, the German cabinet agreed the government draft for the German Annual Tax Act 2020, which, among other things, amends the joint and several liability rules for online platforms to reflect the implementation of the EU e-commerce VAT package. | 174  |
|         | ✓ Enacted | June 9, 2021       | On June 9, 2021, the German ministry of finance issued guidance No. III C 3 -S 7117-b/20/10002 :002 clarifying the VAT treatment applicable to events, including online events. In the guidance, the German ministry of finance confirmed that online seminars provided to businesses are sourced where the business recipient is established and not where the seminar is performed.  | 175  |
|         | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Germany requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to German consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 176  |
|         | ✓ Enacted | November 18, 2021  | On November 18, 2021, the German Federal Tax Court held that in-game “leasing” of virtual land in an online game is not subject to VAT.  | 177  |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country | Status | Latest development | Brief description | Cite   |     |
|---------|--------|--------------------|-------------------|--|-----|
|         | ✓      | Enacted            | April 25, 2024    | On January 31, 2024, Germany's Federal Tax Court (BFH) ruled that a VAT identification number is not the only proof of a customer's VAT taxpayer status. The case involved a foreign corporation, X, that changed its procedure for identifying VAT taxpayers in 2015. Auditors argued that X's new criteria were insufficient, a claim partially upheld by the lower tax court. However, the BFH justified an appeal, clarifying that while a VAT ID is not necessary for identifying a VAT taxpayer, sufficient identification is required. The case was returned to the lower court for further investigation.  | 178 |
|         | ✓      | Enacted            | June 5, 2024      | Effective July 1, 2024, the German ministry of finance considers that business-to-consumer sales of live streaming of events is taxable where the consumer is located.   | 179 |
|         | ✓      | Enacted            | July 10, 2025     | On July 10, 2025, the Lower Saxony Tax Court (Az. 5 K 26/24) held that resales of NFT collectibles are digital services subject to the 19 percent standard, not the 7 percent reduced rate, because the trader did not transfer copyright-like rights. The court ruled that NFT platforms are not intermediaries under Article 9a of the EU VAT Implementing Regulation, rejected the financial services exemption, and—because the trader did not prove customer locations—estimated 50 percent of sales as taxable in Germany while stressing the seller's duty to verify customer location.   | 180 |
|         | ✓      | Enacted            | August 18, 2025   | On August 8, 2025, Germany's Ministry of Finance published BMF Letter No. COO.7005.100.3.12451642 on VAT for online event services, distinguishing on-demand recordings, which are taxed as digital services, from real-time live streams, which may qualify for cultural VAT exemptions or reduced rates if provided by eligible institutions.  | 181 |
| Ghana   | ✓      | Enacted            | October 24, 2022  | Effective January 1, 2014, Ghana requires non-resident vendors of digital services to customers (B2C and B2B) in Ghana to register for and collect VAT if their sales exceed GHS 200,000 in a 12-month period.<br><br>On April 4, 2022, the Ghana Revenue Authority (GRA) launched a portal for non-residents to comply with these requirements.<br><br>On September 12, 2022, Ghana published the Value Added Tax (Amendment) Act 2022 (Act 1082), which clarifies that non-resident providing digital services, electronic commerce, and telecommunication services to persons for use or enjoyment in Ghana are required to register if they make taxable supplies, unless they appoint a local VAT agent. The threshold for VAT registration in the VAT Act does not apply for such non-residents. | 182 |
| Greece  | ✓      | Enacted            | January 1, 2019   | Effective July 1, 2003, Greece requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Greece to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Greece applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 183 |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country   | Status      | Latest development | Brief description  | Cite |
|-----------|-------------|--------------------|--|------|
|           | ✓ Enacted   | July 1, 2021       | Effective July 1, 2021, Greece requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Greek consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 184  |
|           | ✓ Enacted   | July 26, 2021      | Effective July 1, 2021, Greece reduced the VAT rate for electronic books and publications to 6 percent, except for those disallowed under the EU's e-books directive. Particularly, the reduced VAT rate applies to digital editions of books recorded on hard disks and audio recorders; and electronic publications of visual and audio books, other than publications wholly or predominantly devoted to advertising and publications wholly or predominantly consisting of video content or audible music.   | 185  |
|           | ✓ Enacted   | November 30, 2023  | On October 25, 2023, the Complaints Settlement Directorate of the Greek Independent Authority for Public Revenue ruled that cryptocurrency sales are subject to VAT at the standard rate of 24 percent. Furthermore, it noted that the classification of cryptocurrencies as currency, as held by the ECJ in the Hedqvist (Case C-264/14 (October 22, 2015)), has not been incorporated into Greek domestic law and therefore does not bind the tax authority.   | 186  |
|           | ● Proposed  | September 6, 2024  | On September 3, 2024, the Greek Ministry of National Economy and Finance published a draft bill, titled "Digital Transaction Fee and Other Provisions," proposing to replace the stamp duty with a predictable and transparent digital transaction fee effective January 1, 2025. This fee would apply to a variety of transactions, including loans, deposits, compensation, and awards, when at least one party involved is a tax resident in Greece or has a permanent establishment in the country. The bill also imposes the fee on public sector transactions such as government leases, compensations, grants, and services. The fee will be imposed regardless of where the transaction takes place or where the contract is formed or executed. Transactions concluded on or before December 31, 2024, will remain subject to stamp duty. | 187  |
| Guatemala | ● Announced | September 16, 2021 | On September 16, 2021, the Guatemalan tax authority announced that it has taken initial steps toward the implementation of a Digital Economy Compliance system (DEC) to facilitate VAT compliance for foreign providers rendering digital services in Guatemala without physical presence. However, Guatemala has not yet implemented special VAT rules aimed at non-resident digital services providers.  | 188  |
| Honduras  | ● Announced | October 20, 2020   | On October 20, 2020, the head of the Honduras Revenue and Administration Service (SAR) announced that the government is planning to extend the application of VAT to sales of digital services made by non-resident providers.   | 189  |
| Hungary   | ✓ Enacted   | January 1, 2019    | Effective May 1, 2004, Hungary requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Hungary to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Hungary applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 190  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status    | Latest development | Brief description   | Cite |
|---------|-----------|--------------------|---|------|
|         | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Hungary requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Hungarian consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 191  |
| Iceland | ✓ Enacted | December 30, 2016  | Effective January 1, 2011, Iceland requires non-resident vendors of digital services to consumers (B2C) in Iceland to register for and collect VAT if their sales exceed ISK 1 million in a 12-month period.<br>Effective January 1, 2017, Iceland increased the VAT registration threshold from ISK 1 million to ISK 2 million.  | 192  |
| India   | ✓ Enacted | November 21, 2016  | Effective December 1, 2016, India requires non-resident vendors of digital services (including online platforms) to consumers (B2C) in India to register for and collect service tax, regardless of the sales amount. These rules were continued under the new GST regime effective July 1, 2017.   | 193  |
|         | ✓ Enacted | October 1, 2018    | Effective October 1, 2018, India requires e-commerce operators to withhold GST from the consideration received by it on behalf of the supplier of goods, or services who makes supplies through the operator's online platform. The mechanism is known as tax collected at source (TCS). The TCS rules only apply to domestic sales (e.g., Indian vendors using a platform to make sales to Indian consumers).  | 194  |
|         | ✓ Enacted | July 2, 2021       | Effective January 1, 2022, digital platforms facilitating sales of passenger transportation services and restaurants are required to charge and collect GST on the sale of the underlying services.   | 195  |
|         | ✓ Enacted | July 31, 2023      | On March 29, 2023, India's parliament adopted finance bill 2023-24, which, among other things, expands the scope of the current GST rules applicable to non-resident digital services to all non-residents selling remote services to consumers (B2C) in India. In addition, the finance bill imposes penalties on online marketplaces subject to the TCS rules that allow non-GST registered vendors to sell goods or services through their platforms.<br>On July 31, 2023, the Indian government published Notification No. 28/2023- Central Tax, which implements the above changes to the non-resident digital services rules in the Finance Act 2023, effective 2023. | 196  |
|         | ✓ Enacted | August 12, 2023    | On August 4, 2023, India published Notification No. 34/2023, which requires non-resident digital services providers to provide the details of sales made to registered persons (B2B supplies) in India in their monthly GST returns effective October 1, 2023. In addition, India removed the requirement to include the full name and address of the recipient of services on the tax invoice for B2C sales.   | 197  |

## Taxation of the digitalized economy – indirect taxes

|         |           | ✓ <i>Enacted</i>   | ● <i>Proposed / Announced</i> | ✗ <i>Proposal rejected</i>   |      |
|---------|-----------|--------------------|-------------------------------|--|------|
| Country | Status    | Latest development |                               | Brief description  | Cite |
|         | ✓ Enacted | August 22, 2023    |                               | On August 19, 2023, India published the Central Goods and Services Tax (Amendment) Act, 2023 and the Integrated Goods and Services Tax (Amendment) Act, 2023, which among other things, clarifies the GST treatment applicable to online gaming. The acts clarify that "online money gaming" platforms located outside India are subject to GST and are required to register for GST under the simplified registration mechanism for Online Information Database Access and Retrieval (OIDAR) services provider. While the effective date is subject to a government notification, these amendments are proposed to become effective from October 1, 2023. | 198  |

# Taxation of the digitalized economy – indirect taxes

|           |   |         |                   |   |     |
|-----------|---|---------|-------------------|---|-----|
| Indonesia | ✓ | Enacted | February 23, 2022 | Effective July 1, 2020, Indonesia's Directorate General of Taxation (DGT) started appointing non-resident providers of digital services to customers (B2C and B2B) in Indonesia as VAT collection agent if they meet certain transaction value criteria or the amount of traffic within 12 months as defined in regulations.  | 199 |
|           |   |         |                   | On June 25, 2020, the DGT issued Regulation No. PER-12/PJ/2020, which further regulates the new measures for the taxation of electronic transactions (referred to as "PMSE") effective July 1, 2020. The Regulation establishes the following thresholds to be appointed as a VAT collector: (1) the amount of PMSE transactions with Indonesian consumers exceeds IDR 600 million in one year or IDR 50 million in one month; and/or the amount of traffic or access in Indonesia exceeds 12,000 in one year or 1,000 in one month. PMSE businesses that meet the transaction value criteria or the amount of traffic/access criteria will be appointed by the DGT as a VAT collector. Businesses that have met the criteria but have not been designated as VAT collectors should submit notifications online to the DGT. |     |
|           |   |         |                   | On September 8, 2020, Indonesia's DGT published Notice No. SP-41/2020, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.  |     |
|           |   |         |                   | On October 9, 2020, Indonesia's DGT published Notice No. SP-43/2020, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.  |     |
|           |   |         |                   | On November 17, 2020, the DGT published Notice No. SP-47/2020, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.  |     |
|           |   |         |                   | On December 28, 2020, the DGT published Notice No. SP-51/2020, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.  |     |
|           |   |         |                   | On January 29, 2021, the DGT published Notice No. SP-3/2021, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.  |     |
|           |   |         |                   | On March 30, 2021, the DGT published Notice No. SP-10/2021, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.   |     |
|           |   |         |                   | On May 4, 2021, the DGT published Notice No. SP-15/2021, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.  |     |
|           |   |         |                   | On June 3, 2021, the DGT published Notice No. SP-17/2021, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.   |     |
|           |   |         |                   | On August 4, 2021, the DGT published Notice No. SP-23/2021, which lists a new batch of global companies that meet the criteria for collecting VAT in digital goods and services sold to consumers in Indonesia.   |     |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted

● Proposed / Announced

✗ Proposal rejected

| Country                | Status      | Latest development | Brief description  | Cite |
|------------------------|-------------|--------------------|--|------|
|                        |             |                    | <p>On September 6, 2021, the DGT published Notice SP-30/2021, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.</p> <p>On January 7, 2022, the DGT published Notice No SP -2/2022, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia.</p> <p>On February 23, 2022, the DGT published Notice No SP -12/2022, which lists a new batch of global companies that meet the criteria for collecting VAT on digital goods and services sold to consumers in Indonesia</p>  |      |
|                        | ● Announced | March 30, 2022     | <p>On March 30, 2022, Indonesia's Ministry of Finance published Regulation Number 68/PMK.03/2022 on the taxation of crypto transactions effective May 1, 2022. According to the regulation, e-commerce providers that facilitate crypto asset trading transactions (e-commerce trading operators), including crypto asset physical traders and crypto asset electronic wallet service providers, will be designated as VAT collectors on the taxable delivery of crypto assets from the seller to the buyer. The regulation further sets special VAT computation methods depending on the type of seller: 1 percent of the VAT rate multiplied by the transaction value of the crypto assets, where the e-commerce trading operator is a crypto asset physical trader; 2 percent of the VAT rate multiplied by the transaction value of the crypto assets, where the e-commerce trading operator is not a crypto asset physical trader; and for crypto asset mining services, 10 percent of the VAT rate multiplied by the monetary value of the crypto assets received by crypto assets miners.</p> | 200  |
| Internal Monetary Fund | ✓ Enacted   |                    | <p>The International Monetary Fund (IMF) released a new technical note and manual on administering VAT on imported digital services and low value imported goods. The report addresses the main challenges in administering the VAT on imported digital services and the measures that countries have introduced to address the challenges; the main challenges in administering the VAT on low-value imported goods and the measures that countries have introduced to address the challenges; and the key tasks in implementing the measures for improving the administration of VAT on imported digital services and low-value imported goods.</p>  | 201  |
| Ireland                | ✓ Enacted   | January 1, 2019    | <p>Effective July 1, 2003, Ireland requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Ireland to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.</p> <p>Effective January 1, 2019, Ireland applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.</p>  | 202  |
|                        | ✓ Enacted   | July 1, 2021       | <p>Effective July 1, 2021, Ireland requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Irish consumers (B2C), to register for and collect VAT, regardless of the sales amount.</p>  | 203  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status     | Latest development | Brief description   | Cite |
|---------|------------|--------------------|---|------|
|         | ✓ Enacted  | April 27, 2022     | On April 27, 2022, the Irish Revenue Commissioners updated its guidance on the taxation of crypto asset transactions, which includes the VAT treatment of financial services involved in the exchange of digital currency and supply of goods or services in exchange of digital currency.  | 204  |
|         | ✓ Enacted  | May 21, 2022       | On May 21, 2022, the Irish Revenue updated its guidance on the VAT treatment of eGaming services. According to the guidance, the provision of games including games of chance (eGaming) delivered over the Internet or an electronic network are considered digital services taxable subject to VAT at the standard rate.   | 205  |
|         | ✓ Enacted  | June 30, 2025      | On June 26, 2025, the Irish Revenue clarified the VAT sourcing rules for virtual events, effective January 1, 2025. Among other things, it provides that for B2C transactions, the place of taxation is where the non-taxable customer is established, requiring VAT registration or use of the One Stop Shop (OSS) mechanism for VAT compliance. B2B rules remain unchanged. The guidance also addresses hybrid events and updates the VAT treatment for education and vocational training services.   | 206  |
|         | ✓ Enacted  | July 23, 2025      | On July 22, 2025, the Irish Revenue clarified that social media influencers are subject to standard VAT rules. Influencers must register for VAT if their taxable gross receipts exceed the applicable threshold and account for VAT at the 23 percent rate on income from advertising, affiliate marketing, subscriptions, and barter transactions. The guidance outlines VAT obligations including invoicing, recordkeeping, and self-billing arrangements, and clarifies the sourcing rules for B2B and B2C transactions, including electronically supplied services. Optional VAT registration and the One-Stop-Shop (OSS) regime are available for cross-border sales. | 207  |
| Israel  | ✓ Enacted  | March 18, 2022     | Israel's federal tax authority has announced that the same principles applying to the taxation of cryptocurrency transactions also apply to transfers of non-fungible tokens (NFTs). Therefore, the sale of an NFT like the sale of cryptocurrencies, will give rise to a taxable event for VAT purposes.   | 208  |
|         | ● Proposed | March 23, 2023     | On February 15, 2023, Israel published a proposal, which, if approved, would require non-resident vendors of digital services and low-value goods to consumers in Israel (B2C) to register for, collect, and remit VAT.   | 209  |
| Italy   | ✓ Enacted  | January 1, 2019    | Effective July 1, 2003, Italy requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Italy to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br>Effective January 1, 2019, Italy applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 210  |
|         | ✓ Enacted  | July 1, 2021       | Effective July 1, 2021, Italy requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Italian consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 211  |



# Taxation of the digitalized economy – indirect taxes

|         |             | ✓ Enacted          | ● Proposed / Announced | ✗ Proposal rejected   |      |  |
|---------|-------------|--------------------|------------------------|---|------|--|
| Country | Status      | Latest development |                        | Brief description   | Cite |  |
|         | ✓ Enacted   | January 14, 2022   |                        | The Italian tax authorities confirmed that the super-reduced value added tax (VAT) rate of 4 percent applies to subscriptions to online databases, provided that the economic reason for the subscription is the granting of access to editorial products qualifying as newspapers, daily news, releases of press agencies, books and publications with periodical issues and identified by ISBN (International Standard Book Number) or ISSN (International Standard Serial Number).   | 212  |  |
|         | ✓ Enacted   | October 3, 2022    |                        | The Italian tax authorities published Ruling Answer No. 353/2022, in which it clarified that admissions to an event to which participants can join either in person or online are sourced to the country where the event takes place.   | 213  |  |
|         | ✓ Enacted   | January 9, 2023    |                        | The Italian tax authorities recently issued Ruling Answer No. 582/2022 clarifying the VAT treatment of various activities connected to the management and functioning of an online game platform dedicated to e-sports. According to the tax authorities, the provision of services to exchange euros for betacoins, which does not qualify as crypto asset, falls outside the scope of VAT, because the parties to the transaction do not agree on a remuneration for such activity. Conversely, a fee paid to a managing entity for matchmaking service is subject to VAT. The tax authorities further clarified that the provision of betacoins necessary for signing up in a tournament on the online game platform cannot qualify as a supply of vouchers. | 214  |  |
|         | ✓ Enacted   | January 12, 2023   |                        | The Italian tax authorities recently issued Ruling Answer No. 507/2022 clarifying that the issuance of utility tokens during an initial coin offer (ICO) to collect financial resources falls outside the scope of VAT. The tax authorities further highlighted that these topics are currently under discussion both at the domestic and international level and the conclusions reached might change subject to future developments.  | 215  |  |
|         | ✓ Enacted   | January 25, 2023   |                        | On December 29, 2022, Italy published the 2023 Budget law, which, among other things, requires electronic interfaces such as marketplaces, platforms, and portals that facilitate remote sales to consumers (B2C) in Italy of certain goods such as mobile phones, game consoles, tablets, and laptops to send to the Italian tax authorities details of the vendors making such sales. The new reporting requirement is effective January 1, 2023.   | 216  |  |
|         | ● Announced | January 25, 2023   |                        | According to news reports, the Italian authorities are investigating a social media platform for failure to pay VAT on the imputed value of the “free” data which users agree to provide at the time they subscribe to the platform even though the EU’s VAT Committee, in a 2018 working paper, confirmed there is, generally speaking, no direct link between the user signing up to the platform and their agreement to provide data (and thus no VAT should apply).   | 217  |  |



# Taxation of the digitalized economy – indirect taxes

| <div> <div>✓ Enacted</div> <div>● Proposed / Announced</div> <div>✗ Proposal rejected</div> </div> |           |                    |  |      |  |
|--|-----------|--------------------|--|------|--|
| Country  | Status    | Latest development | Brief description  | Cite |  |
| Ivory Coast  | ✓ Enacted | December 28, 2021  | Effective January 4, 2022, the Ivory Coast introduced amendments to its VAT law, including clarifying the sourcing rules for VAT on online sells of goods and services to customer (B2C and B2B) in the Ivory Coast, implementing new simplified compliance procedure, and introducing new sanctions for operators of digital platforms not established in the Ivory Coast, including the suspension of access to their platform, in the event of non-compliance with the obligation to register for tax or to pay VAT on their taxable transactions in the Ivory Coast. However, the tax authorities have not yet issued implementing regulations setting up the compliance mechanism.  | 218  |  |
|  | ✓ Enacted | October 9, 2023    | On October 9, 2023, the tax authorities of Côte d'Ivoire published an explanatory note which clarifies that non-resident vendors (including online platforms) of digital services to customers (B2C and B2B) in Côte d'Ivoire are required to register for and collect VAT, regardless of the sales amount. Taxpayers have six months from the publication of the note to register.  | 219  |  |
| Japan  | ✓ Enacted | July 7, 2015       | <p>Effective October 1, 2015, Japan requires non-resident vendors of digital services to register for and collect Japanese consumption tax (JCT) on sales of digital services to Japanese consumers (B2C), if the non-resident qualifies as a taxable person for JCT purposes. The distinction between B2B and B2C sales is made based on the type of digital service provided and not the customer type.</p> <p>The JCT taxable person status is determined based on the following criteria:</p> <ol style="list-style-type: none"> <li>(1) Businesses which had a taxable sales amounting to more than 10million yen during the Base Period (i.e., the second preceding business year before the taxable period),</li> <li>(2) Businesses which do not fall under category (1) above but have submitted the "Report on the Selection of Taxable Proprietor Status for Consumption Tax," or</li> <li>(3) Businesses which do not fall under category (1) and (2) above and whose taxable sales for Specified Period exceeds 10 million yen (the specified period is in principle the first six-month of the preceding year before the tax period. "10 million yen" for a specified period can be judged by using the total amount of salary and related payments instead of using the amount of taxable sales.</li> </ol> | 220  |  |

# Taxation of the digitalized economy – indirect taxes

| ✓ Enacted  |             | ● Proposed / Announced |   | ✗ Proposal rejected |  |
|------------|-------------|------------------------|---|---------------------|--|
| Country    | Status      | Latest development     | Brief description   | Cite                |  |
|            | ✓ Enacted   | August 7, 2024         | <p>On March 28, 2024, the Japanese parliament passed the 2024 tax reform bills, mandating non-resident "specified platform operators" to collect and remit Japanese consumption tax (JCT) on sales of digital services to final consumers they facilitate for non-residents, effective from April 1, 2025. A non-resident becomes a "specified platform operator" if the total amount for such services provided via the platform exceeds JPY 5 billion during the taxable period, usually a fiscal year. These operators must notify the National Tax Agency (NTA) by the due date of a final consumption tax return for the taxable period, and the designation becomes effective six months after this due date.</p> <p>On July 30, 2024, the National Tax Agency (NTA) of Japan published Frequently Asked Questions (FAQs) about the upcoming "Platform Taxation" regime. The FAQs, which include 18 topics for foreign sellers and 32 for digital platform operators, address practical aspects of the regime, such as invoicing flow, small business exception eligibility, and input tax credit calculation. They also clarify the tax treatment of in-game money in online video games, stating that the consumption tax will be levied when in-game items are sold, not when in-game money is initially issued. However, under certain conditions, platform operators may choose to pay the tax at the initial issuance of the in-game money.</p> | 221                 |  |
| Jersey     | ✓ Enacted   | January 6, 2023        | Effective July 1, 2023, Jersey requires online marketplaces and large offshore retailers to register for and collect GST where the annual aggregated customs value of their supplies to Jersey residents exceeds GBP 300,000. This means that GST is charged at the point of sale, and remitted directly to the Treasury, where goods exceed the prevailing GST de minimis level (the import GST de minimis level is reduced from GBP 135 to GBP 60).   | 222                 |  |
| Kazakhstan | ✓ Enacted   | February 22, 2021      | Effective January 1, 2022, Kazakhstan requires non-resident vendors of digital services to consumers (B2C) in Kazakhstan to register for and collect VAT, regardless of the sales amount.   | 223                 |  |
|            | ✓ Enacted   | September 3, 2021      | Effective January 1, 2022, Kazakhstan requires non-resident vendors of low value consignments (i.e., those below EUR 200) to consumers in Kazakhstan to register for and collect VAT. Special rules apply for goods shipped from the Eurasian Economic Union (i.e., Armenia, Belarus, the Kyrgyz Republic, and Russia).   | 224                 |  |
|            | ● Announced | August 22, 2025        | Kazakhstan's State Revenue Committee recently launched a public consultation on a draft introducing "conditional VAT registration" for foreign e-commerce sellers using online marketplaces, aligned with Tax Code changes effective January 1, 2026.   | 225                 |  |

# Taxation of the digitalized economy – indirect taxes

|         |           | ✓ Enacted          | ● Proposed / Announced   | ✗ Proposal rejected |      |
|---------|-----------|--------------------|--|---------------------|------|
| Country | Status    | Latest development | Brief description  |                     | Cite |
| Kenya   | ✓ Enacted | July 15, 2022      | <p>Effective April 1, 2021, Kenya requires non-resident vendors of digital services to consumers (B2C) in Kenya to register for and collect VAT if their sales exceed KSH 5 million in a 12-month period. Non-resident digital services providers are also subject to the 1.5 percent digital services tax.</p> <p>On September 10, 2020, Kenya published the final version of the Value Added Tax (Digital Marketplace Supply) Regulations, 2020. The regulations cover the scope of taxable supplies, registration requirements, simplified registration for non-residents, rules on place and time of supplies, etc. The regulations include a transitional period of 6 months following their publication, after which they will be applied. Vendors making taxable sales are required to register or appoint a tax representative before the transitional period ends.</p> <p>On June 29, 2021, Kenya published the Finance Act 2021, which, among other things, expands the definition of digital services to include sales made over the internet or an electronic network in addition to those made through a digital marketplace. Further, it expands the definition of a digital marketplace to mean an online platform that enables users to sell or provide services, goods, or other property to other users.</p> <p>On June 23, 2022, Kenya enacted the Finance Bill 2022, which among other things, amends the VAT rules applicable to non-resident digital services providers effective July 1, 2022. The Finance Bill 2022 clarifies that the VAT registration threshold of KES 5 million no longer applies to non-resident digital services providers. The Finance Bill 2022 further clarifies that domestic businesses are exempt from applying the reverse charge mechanism on the importation of digital supplies. Consequently, non-resident digital services providers are not only required to register for and collect VAT on B2C supplies of digital services, but also on B2B supplies.</p> |                     | 226  |
|         | ✓ Enacted | March 21, 2023     | <p>On March 21, 2023, the Kenya Revenue Authority published the Value Added Tax (Electronic, Internet and Digital Marketplace Supply) Regulations, 2023, which, amends the current VAT rules applicable to non-resident digital services providers. Among other changes, the regulation clarify that the following services are in scope of the non-resident VAT digital services rules: (1) services that link the supplier to the recipient including transport-hailing services or platforms; (2) the sale of, licensing of, or any other form of monetizing data generated from the users' activities; and (3) facilitation of online payments or exchange of digital assets excluding services exempt in the VAT Act. The regulation would further clarify that non-resident digital services providers are exempted from the requirement to issue an e-invoice and clarify the geolocation rules to determine the location of the customer.</p>  |                     | 227  |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted
● Proposed / Announced
✗ Proposal rejected

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
|         | ✓ Enacted | January 29, 2025   | On December 13, 2024, Kenya published the Tax Laws (Amendment) Act, 2024, which, among other things, amends the Excise Duty Act, 2015 to include excisable services provided by non-residents via digital platforms. This change, effective immediately, subjects non-resident digital service providers to the same excise duty obligations as local providers. The excise duty, set at 15 percent, now applies to various digital services such as money transfers, betting, gaming, prize competitions, and online advertisements for certain products. Non-residents must comply by applying for an operating license and face penalties for non-compliance. Excise duty payments are due within specific periods depending on the service type, including 24 hours from the closure of transactions for betting and gaming transactions.  | 228  |
|         | ✓ Enacted | May 21, 2025       | On June 6, 2025, the Kenyan Tax Appeal Tribunal published its decision in Multichoice Africa Holdings BV, [2025] KETAT 226 (KLR), regarding the VAT qualification of digital satellite television services (DSTV). In the case, a non-resident company providing DSTV services contended that its DSTV services should be treated as traditional broadcasting, qualifying for VAT recovery, and argued against the retroactive application of the 2023 Digital Marketplace Supply Regulations. The Kenya Revenue Authority (KRA) argued that DSTV services are digital in nature, falling under the digital marketplace category, thus disallowing VAT deductions. The Tribunal upheld the KRA's position, confirming that the services are digital services subject to VAT under Sections 5(7) to 5(9) of the VAT Act, and denied VAT deduction claims for business-to-consumer transactions on digital platforms.  | 229  |
|         | ✓ Enacted | July 4, 2025       | On June 26, 2025, Kenya's president assented the Finance Act, 2025, which, among other things, broadens the scope of the VAT rules for non-resident digital services providers to include internet-based radio and television broadcasting services, thereby taxing streaming services that were previously untaxed. It also expands the significant economic presence (SEP) tax to cover services provided through the internet or an electronic network beyond just those offered through digital marketplace and removes the KES 5 million registration threshold. Additionally, the bill clarifies that digital services provided to Kenyan consumers are subject to excise tax and extends this tax to services offered via the internet or an electronic network, beyond just those offered through digital marketplace.   | 230  |
| Kosovo  | ✓ Enacted | July 31, 2025      | <p>Effective September 1, 2015, Kosovo requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Kosovo to register for and collect VAT, regardless of the sales amount.</p> <p>On February 14, 2022, the tax authorities of Kosovo reminded non-resident digital services providers that they are required to register for VAT and charge VAT on sales to consumers in Kosovo.</p> <p>On July 30, 2025, the Kosovo tax administration published a clarification on the VAT treatment of digital services. It provides that when a taxpayer is not established in Kosovo provides digital services to non-taxpayers in Kosovo (B2C), the services are sourced to Kosovo. These non-resident entities must appoint a tax representative and register for VAT within five days of the representative's appointment. The guidance also confirms that e-commerce is taxed similarly to traditional commerce and outlines the scope of digital services subject to VAT when delivered via automated digital platforms.</p> | 231  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country       | Status    | Latest development | Brief description  | Cite |
|---------------|-----------|--------------------|--|------|
| Kyrgyzstan    | ✓ Enacted | June 23, 2022      | Effective January 1, 2022, Kyrgyzstan requires non-resident vendors of digital services to customers (B2C and B2B) in Kyrgyzstan to register for and collect VAT, regardless of the sales amount.<br><br>On June 10, 2022, the Kyrgyzstan State Tax Service announced the launch of an online service (vat.salyk.kg) for the VAT registration of non-resident digital services providers.  | 232  |
| Laos          | ✓ Enacted | March 29, 2024     | Effective August 1, 2024, Laos requires non-resident vendors of digital services (including online platforms) to consumers (B2C) in Laos to register for and collect VAT, regardless of the sales amount.  | 233  |
| Latvia        | ✓ Enacted | January 1, 2019    | Effective May 1, 2004, Latvia requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Latvia to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Latvia applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 234  |
|               | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Latvia requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Latvian consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 235  |
| Liechtenstein | ✓ Enacted | January 1, 2019    | Effective January 1, 2010, Liechtenstein requires non-resident vendors of digital services to consumers (B2C) in Switzerland to register for and collect VAT if their sales exceed CHF 100,000 in a 12-month period.<br><br>Effective January 1, 2018, Liechtenstein amended the computation method of the VAT registration threshold for non-resident digital services providers so that the CHF 100,000 threshold applies on a worldwide income.<br><br>Effective January 1, 2019, Liechtenstein expanded the new threshold computation to non-resident suppliers of low-value consignments (i.e., goods where the amount of import VAT does not exceed CHF 5), thus requiring such businesses also to register for and collect VAT. | 236  |
|               | ✓ Enacted | October 31, 2024   | On October 29, 2024, Liechtenstein published Law No. 641.20 which amended the VAT Act, effective January 1, 2025. Among other things, the law includes measures implementing the new Swiss VAT collection obligation for digital platforms facilitating the sale of goods.   | 237  |
|               | ✓ Enacted | January 1, 2019    | Effective May 1, 2004, Lithuania requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Lithuania to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Lithuania applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 238  |

# Taxation of the digitalized economy – indirect taxes

|            |           | ✓ <i>Enacted</i>   | ● <i>Proposed / Announced</i> | ✗ <i>Proposal rejected</i>  |      |
|------------|-----------|--------------------|-------------------------------|---|------|
| Country    | Status    | Latest development |                               | Brief description   | Cite |
|            | ✓ Enacted | July 1, 2021       |                               | Effective July 1, 2021, Lithuania requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Lithuanian consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 239  |
|            | ✓ Enacted | March 27, 2025     |                               | On March 24, the Lithuanian tax authority published a set of frequently asked questions (FAQs) regarding tax obligations for influencer activities. The document covers a range of topics, including the procedures for reporting the start of individual activities, the appropriate activity code type for influencers, allowable expense deductions, and the VAT implications of influencer activities. It also provides guidance on when influencers must register as VAT taxpayers, the procedures for VAT registration, and the treatment of costs not included in the estimate of specific advertising services. | 240  |
| Luxembourg | ✓ Enacted | January 1, 2019    |                               | Effective July 1, 2003, Luxembourg requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Luxembourg to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.   | 241  |
|            | ✓ Enacted | July 1, 2021       |                               | Effective January 1, 2019, Luxembourg applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 242  |

# Taxation of the digitalized economy – indirect taxes

|          |           | ✓ Enacted          | ● Proposed / Announced  | ✗ Proposal rejected |  |
|----------|-----------|--------------------|---|---------------------|--|
| Country  | Status    | Latest development | Brief description   | Cite                |  |
| Malaysia | ✓ Enacted | June 6, 2023       | <p>Effective January 1, 2020, Malaysia requires non-resident vendors (including online platforms) of digital services to customers (B2C and B2B) in Malaysia to register for and collect service tax if their sales exceed MYR 500,000 in a 12-month period. Businesses that have been charged service tax on digital services provided by a foreign registered person (FRP) are exempted from accruing service tax in Malaysia on these imported taxable services.</p> <p>On August 30, 2019, the Royal Malaysian Customs Department (RMCD) published the Service Tax (Digital Services) Regulations 2019, which set out the rules pertaining to the registration, compliance, and penalties for the new service tax obligations on digital services.</p> <p>On August 1, 2020, the RMCD published a new service tax industry guide, Guide on Digital Services by Foreign Service Provider, which updates and replaces the guide published in August 2019.</p> <p>On February 1, 2021, the RMCD updated its Guide on Digital Services by Foreign Service Provider to include new examples of the provision of digital services; new guidance regarding the exemption for digital services provided within the same group; and new guidance on when tax is due; and new guidance on the possibility to request a remission from penalties.</p> <p>Effective January 1, 2022, Malaysia introduced a Special Voluntary Disclosure Program for indirect taxes running through September 30, 2022. The program applies to outstanding indirect tax liabilities, including for non-resident digital services providers, existing on or before October 31, 2021.</p> <p>On June 6, 2023, the Royal Malaysian Customs Department (RMCD) launched a new Voluntary Disclosure Program for indirect taxes, including non-resident digital services providers, that will run until May 31, 2024. Participants in the program will receive a 100% penalty remission and no audits will be conducted by RMCD on participants for the period disclosed.</p> | 243                 |  |
|          | ✓ Enacted | August 1, 2022     | <p>On August 9, 2021, the RMCD issued a policy document on the service tax exemption for digital services provided in relation to banking or financial services. It clarifies that the service tax exemption applies to digital service providers that charge fees to the service recipient (bank account holder) to initiate transfer or withdrawal of funds. The fees charged refer to fee charges for withdrawal or transfer of funds only and the fees are charged directly to the account holder.</p> <p>On August 1, 2022, the RMCD published the Service Tax Policy 1/2022 relating to the service tax exemption on the provision of digital payment services by local non-bank providers. The guidance provides that the following local non-bank service providers that meet the relevant qualification requirements are exempt from charging service tax on digital payment services: payment instrument issuers, merchant acquirers, and payment system operators.</p>   | 244                 |  |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country   | Status    | Latest development | Brief description   | Cite |
|-----------|-----------|--------------------|---|------|
|           | ✓ Enacted | October 6, 2021    | <p>Malaysia enacted new legislation imposing a tax on digital platforms that provide tourism related services effective January 1, 2022. The RMCD subsequently announced the postponement date for the implementation of tourism tax on accommodation premises booked through digital platform service from January 1, 2022 to January 1, 2023. The effective date for registration by the digital platform service provider was also postponed from October 1, 2021 to October 1, 2022.</p> <p>On January 20, 2021, the Royal Malaysian Customs Department issued a set of “frequently asked questions” (FAQs) about the tourism tax and specifically addressing the expanded scope of the tourism tax regarding accommodations booked via an online platform. Digital platform service providers will need to modify their system to identify the citizenship status of each tourist (through an identity card number or passport number).</p>                                      | 245  |
|           | ✓ Enacted | November 6, 2023   | <p>Malaysia’s parliament adopted the Sales Tax (Amendment) Bill 2022, which requires online sellers of low value goods (LVG) brought into Malaysia to register for and charge sales tax. A seller is defined as a person, whether in or outside Malaysia, who sells LVG on an online marketplace or operates an online marketplace for the sales and purchase of LVG. An LVG is defined as any prescribed good or class of goods outside Malaysia which are sold at a price not more than a prescribed amount and brought into Malaysia in the manner as prescribed. The bill will come into operation on a date to be appointed by the Minister by notification in the form of a gazette order.</p> <p>On November 3, 2023, the Malaysian tax authority published a new sales tax on low value goods guide announcing that the regime will be effective January 1, 2024. In addition, the RMCD published on November 6, 2023 a FAQ providing further guidance on the new regime.</p> | 246  |
| Malta     | ✓ Enacted | January 1, 2019    | <p>Effective May 1, 2004, Malta requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Malta to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.</p> <p>Effective January 1, 2019, Malta applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.</p>  | 247  |
|           | ✓ Enacted | July 1, 2021       | <p>Effective July 1, 2021, Malta requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Maltese consumers (B2C), to register for and collect VAT, regardless of the sales amount.</p>   | 248  |
| Mauritius | ✓ Enacted | September 3, 2025  | <p>On August 9, 2025, Mauritius published the Finance Act 2025, which, among other things, requires non-resident digital service providers to register for VAT starting January 1, 2026. The rules apply to B2C transactions. Registration is mandatory from the first sale, with no threshold, but a tax representative must be appointed if annual sales exceed MUR 3 million. Providers must determine customer location using at least two geolocation indicators (e.g., billing address, bank location), file VAT returns electronically within 20 days of each taxable period, and report taxable sales.</p>  | 249  |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country | Status | Latest development | Brief description   | Cite  |     |
|---------|--------|--------------------|---|---|-----|
| Mexico  |        |                    | Effective June 1, 2020, Mexico requires non-resident vendors of digital services to consumers (B2C and B2B) in Mexico to register for and collect VAT, regardless of the sales amount. Mexico qualifies only the following as digital services falling within the scope of the new rules: (1) downloads of, or access to, images, films, text, information, video, audio, music, games, including gaming, as well as other multimedia content, multi-player environments, ringtones, news streaming, traffic information, weather forecast and statistics; (2) intermediation between third parties that supply and demand goods or services; (3) online clubs and dating websites; and (4) remote teaching, tests, or exercises. In addition, digital intermediation platforms facilitating the sale for goods and services for Mexican individuals are required to withhold income tax and VAT on the underlying transaction. |   |     |
|         | ✓      | Enacted            | June 3, 2020  | Effective January 1, 2021, Mexico amended the non-resident VAT digital services rules. The amendments include stricter sanctions for non-compliance with the tax obligations of foreign digital services providers according to which the Mexican tax authority may request internet service providers to temporary blocks the ability of foreign digital services providers to offer digital services in Mexico if these providers have not complied with certain obligations. The amendments further simplify the withholding requirement for digital intermediation platforms by replacing the current gradual income tax withholding rates with a fixed rate for each activity. The amendments further clarify that intermediation services will be subject to VAT when a sale of used personal property is involved. Moreover, digital intermediation platforms that process payments are required to collect VAT when non-residents provide digital services into Mexico. Finally, digital intermediation platforms are allowed to display the price of the goods or services including the amount of tax with the statement "VAT inclusive." | 250 |
|         | ✓      | Enacted            | January 10, 2022  | Effective January 1, 2022, Mexico City levies a 2 percent gross receipts tax on businesses that operate, use, or administer applications or platforms through which users can contract the delivery of packages, food, groceries, or any type of merchandise within the territory of Mexico City.   | 251 |
|         | ✓      | Enacted            | July 16, 2024   | The Mexican tax authority recently introduced two new requirements for registering foreign digital service providers. Firstly, the provider's deeds of incorporation or bylaws must specify that the company's purpose is to provide services through a technological platform where goods are sold or leased. Secondly, the legal representative must sign an affidavit detailing the goods or services sold, the transaction website, and the main business administration address. Companies already registered for VAT on digital services in Mexico don't need to amend their bylaws, but new registrants should carefully review all formalities and evaluate their options to comply with these requirements.  | 252 |
|         | ✓      | Enacted            | October 9, 2024   | On September 30, 2024, the Government of the State of Veracruz published the general rules for the collection and payment of the tax for the provision of lodging services on digital platforms. These rules apply to individuals or entities that act as intermediaries, facilitators, or promoters, involved in the collection of payments for lodging services via digital means. These rules came into effect on October 1, 2024.   | 253 |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted

● Proposed / Announced

✗ Proposal rejected

| Country | Status     | Latest development | Brief description   | Cite |
|---------|------------|--------------------|---|------|
|         | ✓ Enacted  | October 25, 2024   | On October 11, 2024, the Mexican tax authority issued the “Second Resolution of Modifications to the Miscellaneous Fiscal Resolution for 2024,” introducing several key changes affecting digital platforms. Firstly, platforms acting as intermediaries in the sale of goods must now withhold 100 percent of VAT when payments are made to foreign bank accounts, issue a digital tax receipt within five days, and submit detailed VAT withholding declarations by the 17th of the following month. Additionally, debt crowdfunding platforms are now responsible for withholding VAT on interest payments, a shift from the previous responsibility placed on borrowers. These platforms must also report to the tax authority and issue necessary digital tax receipts. The resolution further clarifies the definition of digital intermediation services for VAT purposes, categorizing platforms that enable clients to offer goods or services via digital networks as intermediaries, regardless of how they present themselves.  | 254  |
|         | ● Proposed | September 12, 2025 | On September 8, 2025, Mexico’s Executive sent the 2026 Economic Package to Congress with VAT and excise (IEPS) changes targeting the digital economy; if Congress approves it by October 31, 2025, most rules would start January 1, 2026, and the tax authority (SAT) would issue guidance by year-end. The bill expands platform withholding to business sellers and tightens controls on non-residents: platforms would withhold 50 percent of VAT and 4 percent income tax when sellers provide an RFC (Mexican tax ID) and 100 percent of VAT and 20 percent income tax when they do not, and they would withhold 100 percent of VAT on goods located in Mexico and on proceeds paid to foreign bank accounts. Platforms would further be required to issue e-invoices (CFDI) for withholdings and report all sellers even if they do not process payment. The package further raises IEPS on betting and sweepstakes to 50 percent applicable also to non-resident operators, adds an 8 percent IEPS on violent/adult video games, requires foreign operators to register (RFC), appoint a representative and tax domicile, and collect/remit IEPS. Finally, platforms—Mexican and foreign—would have to grant SAT real-time online access to Mexican transaction data. | 255  |
|         | ✓ Enacted  | September 16, 2025 | On September 15, 2025, Mexico’s tax administration published an updated list of non-resident providers of digital services that are registered for VAT in Mexico. As of August 31, 2025, the updated list states that 268 foreign digital service providers are registered for VAT.   | 256  |
| Moldova | ✓ Enacted  | November 30, 2020  | Effective April 1, 2020, Moldova requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Moldova to register for and collect VAT, regardless of the sales amount.<br><br>On October 17, 2020, Moldova’s State Tax Service (STS) issued Order No. 539, which provides new guidance on the tax practice for the levy of VAT on non-resident providers of digital goods and services (e-commerce).<br><br>On November 4, 2020, the STS published Order No. 561, which provides guidance concerning the levy of VAT on non-resident digital service providers. In particular, the order addresses the question of who is responsible for the payment of VAT where a natural person resident in Moldova contracts and pays for online advertising services provided by a non-resident.  | 257  |
|         | ✓ Enacted  | April 19, 2022     | Effective April 15, 2022, Moldova introduced a VAT exemption for e-books and e-periodicals.   | 258  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country     | Status    | Latest development | Brief description   | Cite |
|-------------|-----------|--------------------|---|------|
| Montenegro  | ✓ Enacted | August 1, 2017     | Effective August 1, 2017, Montenegro requires non-resident vendors of remote services to consumers (B2C) in Montenegro to register for and collect VAT, regardless of the sales amount.   | 259  |
| Morocco     | ✓ Enacted | March 4, 2024      | Effective January 1, 2024, Morocco requires non-resident vendors of digital services to consumers (B2C) in Morocco to register for and collect VAT, regardless of the sales amount. The tax authorities have yet to publish details on the compliance mechanism, including a registration portal.   | 260  |
|             | ✓ Enacted | December 31, 2024  | On December 20, 2024, Morocco published the Finance Law for 2025, which, among other things, clarifying the criteria for determining when digital services provided remotely by non-residents are considered sold to customers in Morocco. These criteria include using a Moroccan address for invoicing, payment through a bank card from a Moroccan institution, accessing services via an IP address located in Morocco, or using Morocco's international telephone code. Additionally, the law changes the return filing frequency for these non-resident service providers from a monthly to a quarterly basis, which must be filed through a dedicated electronic platform that the tax authority has to setup. | 261  |
| Nepal       | ✓ Enacted | July 12, 2024      | Effective May 29, 2022, Nepal requires non-resident vendors of digital services to consumers (B2C) in Nepal to register for and collect VAT if their sales exceed NPR 2 million in a 12-month period. In addition, non-resident digital services providers are also subject to the 2 percent digital services tax.<br><br>Effective July 16, 2024, Nepal increased the registration thresholds for non-residents liable to collect VAT on sales of digital services from NPR 2 million to NPR 3 million.  | 262  |
|             | ✓ Enacted | June 6, 2023       | On June 1, 2023, Nepal's tax authority updated its guidelines regarding the VAT requirements for non-resident digital services. The updates include holding B2C customers liable for VAT if they wrongly declare themselves as a business, allowing non-resident registered taxpayers to issue e-invoices without the approval of the tax authority, and accounting for foreign currency transactions according to the Nepalese Rastra Bank exchange rate on the day of return submission.  | 263  |
|             | ✓ Enacted | August 15, 2025    | On August 12, 2025, Nepal's Inland Revenue Department issued updated VAT procedures for digital services provided by non-residents. Non-residents must register for VAT within 30 days of exceeding the registration threshold of NPR 3 million in the past 12 months. VAT returns must be filed electronically by the 25th of the month following the tax period.  | 264  |
| Netherlands | ✓ Enacted | January 1, 2019    | Effective July 1, 2003, the Netherlands requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in the Netherlands to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, the Netherlands applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 265  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country              | Status     | Latest development | Brief description   | Cite |
|----------------------|------------|--------------------|---|------|
|                      | ✓ Enacted  | July 1, 2021       | Effective July 1, 2021, the Netherlands requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Dutch consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 266  |
|                      | ✓ Enacted  | July 29, 2024      | On October 20, 2023, the Dutch tax authority announced a waiver of penalties until July 1, 2024, for taxpayers that are non-compliant with the EU VAT e-commerce package. The tax authority will further refund any penalties already paid and will close all outstanding disputes in favour of the taxpayers, except in cases where taxpayers deliberately did not pay the full VAT due.<br><br>On July 29, 2024, the Netherlands published Decree No. 2024-16101 that administrative fines on VAT e-commerce defaults will continue to be waived until January 1, 2025.   | 267  |
|                      | ● Proposed | October 3, 2025    | On October 3, 2025, the Dutch Ministry of Finance launched a public consultation on draft legislation introducing new VAT obligations for digital platforms facilitating short-term accommodation rentals and road passenger transport in line with the VAT in the Digital Age package. Effective from July 1, 2028, the proposed rules would require platforms to collect and remit VAT on services offered through their systems and maintain records verifying the VAT status of service providers. Platforms would become liable for VAT unless providers can demonstrate compliance or exemption under the Dutch small business rules. | 268  |
| <b>New Caledonia</b> | ✓ Enacted  | October 23, 2020   | Effective April 1, 2017, New Caledonia requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in New Caledonia to register for and collect VAT if their sales exceed XFP 7.5 million in a 12-month period.   | 269  |
| <b>New Zealand</b>   | ✓ Enacted  | August 1, 2016     | Effective October 1, 2016, New Zealand requires non-residents (including online platforms) providing remote services, including digital services, to consumers (B2C) in Australia to register for and collect GST if their sales exceed NZD 60,000 in a 12-month period.  | 270  |
|                      | ✓ Enacted  | June 28, 2019      | Effective December 1, 2019, non-resident vendors (including online platforms) selling low value consignments of goods valued below NZD 1,000 to New Zealand consumers (B2C) must register for and collect GST if their sales exceed NZD 60,000 in a 12-month period.  | 271  |
|                      | ✓ Enacted  | March 7, 2022      | On March 29, 2022, New Zealand's parliament adopted a bill, which, among other things, excludes crypto assets from the GST and financial arrangements rules.  | 272  |

# Taxation of the digitalized economy – indirect taxes

|         |            | ✓ Enacted          | ● Proposed / Announced   | ✗ Proposal rejected |  |
|---------|------------|--------------------|--|---------------------|--|
| Country | Status     | Latest development | Brief description  | Cite                |  |
|         | ✓ Enacted  | March 7, 2023      | <p>On March 31, 2023, New Zealand enacted the “Taxation (Annual Rates for 2022-23, Platform Economy, and Remedial Matters) Bill,” which, among other things, introduces GST collection obligations on electronic marketplaces that facilitate accommodation and transportation services effective April 1, 2024 and introduces new information reporting requirements for New Zealand digital platform operators in the gig and sharing economy.</p> <p>On June 19, 2023, New Zealand’s Inland Revenue published guidance for the application of the “marketplace rules for listed services.” “Listed services” include ride-sharing and ride-hailing, delivery services for beverages, food, or both, and taxable accommodation that are performed, provided, or received in New Zealand.</p>   | 273                 |  |
|         | ✓ Enacted  | March 28, 2024     | <p>On March 28, 2024, New Zealand enacted the Taxation (Annual Rates for 2023-24, Multinational Tax, and Remedial Matters) Act 2024, introducing a 12% duty on offshore gambling profits from online gambling operators targeting New Zealand consumers, effective from July 1, 2024. The Act also includes a transitional rule exempting electronic marketplace operators from deducting GST on sales of accommodation services contracted before April 1, 2024, but provided after this date.</p>  | 274                 |  |
|         | ● Proposed | August 30, 2024    | <p>On August 26, 2024, New Zealand’s parliament accepted for consideration the Taxation (Annual Rates for 2024–25, Emergency Response, and Remedial Measures) Bill, which, among other things, would require a non-resident sellers to adopt a 3-month taxable period if their only sales in New Zealand are remote sales taxable goods, listed services (i.e., non-exempt sales of accommodation services in New Zealand, ride-sharing or ride-hailing services or delivery services for beverages or food), or remote services provided to a person resident in New Zealand (other than services that are physically performed in New Zealand by a person who is in New Zealand at the time the services are performed). The bill would further allow operators of electronic marketplaces and underlying sellers to opt accounting for GST on a sale of taxable accommodation made through an electronic marketplace on the completion of the performance of the services. Moreover, the bill would introduce technical amendments related to the platform economy to address minor issues with the rules that were not anticipated at the time of their introduction (e.g., requirement on platforms to provide certain taxable information and correction information).</p> | 275                 |  |

# Taxation of the digitalized economy – indirect taxes

| ✓ Enacted |            | ● Proposed / Announced |  | ✗ Proposal rejected |  |
|-----------|------------|------------------------|--|---------------------|--|
| Country   | Status     | Latest development     | Brief description  | Cite                |  |
|           | ● Proposed | May 19, 2025           | The New Zealand Inland Revenue recently published two draft guidance documents for consultation, clarifying GST obligations for services provided through electronic marketplaces. The first guidance states that GST listed services rules apply when sales are facilitated by a marketplace operator, distinguishing between direct marketplace interactions and non-marketplace transactions like physical store purchases. It outlines the GST treatment of transactions involving marketplace operators and listing intermediaries, emphasizing the marketplace's responsibility for GST and flat-rate GST credits. The second guidance explains how to identify sales that fall under GST listed services rules when combined with other goods or services, using standard GST principles to determine if supplies are single or multiple. Effective April 1, 2024, New Zealand requires marketplace operators to collect GST on accommodation and transportation services, with provisions for non-registered suppliers and intermediaries. The guidance highlights that only sales made through a marketplace are subject to listed services rules, while other direct supplies follow standard GST rules. | 276                 |  |
| Niger     | ✓ Enacted  | January 24, 2025       | On December 31, 2024, Niger published the Finance Act 2025, which, among other things, introduces effective January 1, 2025, a VAT registration requirement for non-residents selling goods and services via foreign or local e-commerce platforms, as well as commissions earned by e-commerce platform operators for facilitating such transactions.   | 277                 |  |
| Nigeria   | ✓ Enacted  | January 16, 2020       | Nigeria's parliament recently approved the Finance Act of 2019, which, among other things, introduces a requirement for non-resident vendors to register for and collect VAT on services (including digital services) provided to customers in Nigeria.<br><br>On May 29, 2020, the government of Nigeria issued an Order that defines the significant economic presence standard (SEP), which was introduced earlier this year with the Finance Act for 2020. According to the Order, which is retroactive effective February 3, 2020, a non-resident will be considering having SEP in Nigeria if the non-resident makes sales of digital services (as defined in the Order) which exceed an annual threshold of NGN 25 million (\$64,500). If a non-resident is deemed to have a SEP in Nigeria, it is required to register for tax purposes with the Nigerian tax authority and file all required returns, including income tax and VAT.   | 278                 |  |
|           | ✓ Enacted  | April 13, 2021         | Effective January 1, 2021, non-resident persons selling goods or services to Nigerian customers, whether digital or general services consulting, are required to register with the Federal Inland Revenue Service (FIRS) for VAT purposes, even if they do not meet the local significant economic presence requirements.  | 279                 |  |
|           | ✓ Enacted  | December 31, 2021      | On October 11, 2021, the Nigerian tax authority published guidelines explaining a new VAT simplified compliance regime for non-resident vendors. The guidelines are effective January 1, 2022 for non-residents providing services and intangibles, and January 1, 2024 for non-residents selling goods. The guidelines include provisions for the definition of goods and services in scope, and conditions to qualify for registration under the simplified regime. The provisions of the guidelines were codified in the Finance Act, 2021  | 280                 |  |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country                | Status    | Latest development | Brief description   | Cite |
|------------------------|-----------|--------------------|---|------|
|                        | ✓ Enacted | October 31, 2022   | The Federal Inland Revenue Service (FIRS) recently issued a public notice announcing its intention to deploy the “Sentinal National Payment Gateway” that will provide FIRS with the ability to collect taxes on gaming transactions in real time, thereby improving tax compliance with respect to companies providing online gaming services. FIRS has mandated all Nigerian and non-resident companies (NRCs) offering online gaming services to Nigerian customers, to connect to the gateway no later than December 31, 2022.  | 281  |
|                        | ✓ Enacted | July 10, 2023      | On May 28, 2023, Nigeria enacted its 2023 Finance Act, which, among other things, changes the deadline for monthly VAT return compliance from the 21st to the 14th of each month. The Finance Act further provides that goods purchased through an online electronic/digital platform, operated by a non-resident supplier who has been appointed as a VAT collector by the tax authority, and imported into Nigeria will not be subjected to a further VAT on their clearance with the Nigerian Customs Service provided that the importer can show evidence that the non-resident supplier charged VAT on the sales invoice. Nigeria’s president subsequently issued an executive order deferring the implementation of changes in the Finance Act 2023 from May to September 2023. | 282  |
|                        | ✓ Enacted | July 29, 2025      | On July 24, 2025, the Federal High Court in Lagos affirmed the authority of the Federal Inland Revenue Service (FIRS) to designate non-resident platform operators as VAT collection agents. The ruling upheld the FIRS’s directive requiring a ride-hailing and food delivery platform to collect and remit VAT on food and transport services provided by third-party vendors and drivers using its platform. The court confirmed that such designation aligns with the Nigerian VAT law, reinforcing the FIRS’s power to enforce VAT compliance on digital service intermediaries operating in Nigeria.  | 283  |
| <b>North Macedonia</b> | ✓ Enacted | August 1, 2023     | Effective January 1, 2024, North Macedonia requires non-resident vendors of digital services to consumers (B2C) in Macedonia to register for and collect VAT, regardless of the sales amount.   | 284  |
| <b>Norway</b>          | ✓ Enacted | March 1, 2010      | Effective July 1, 2011, Norway requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Norway to register for and collect VAT if the sales exceed NOK 50,000 in a 12-month period.   | 285  |
|                        | ✓ Enacted | March 6, 2020      | Effective January 1, 2020, non-resident vendors (including online platforms) selling low value consignments of goods valued below NOK 3,000 to Norwegian consumers (B2C) must register for and collect VAT if their sales exceed NOK 50,000 in a 12-month period. The requirement first applied to vendors of food and beverages, restricted goods such as endangered animal species, certain chemicals and medicines, and certain other taxable goods, such as motor oil. Effective April 1, 2020, the requirement was expanded to vendors of other goods, including clothing, shoes, and electronics.   | 286  |
|                        | ✓ Enacted | December 20, 2019  | Effective January 1, 2020, digital platforms providing real estate leasing services are required to report information about lessors to the tax authority.  | 287  |
|                        | ✓ Enacted | December 16, 2022  | The tax authority of Norway clarified that the transfer of digital works of art is a digital service subject to VAT. Such a sale does not fall within the VAT exemption for the sale by an author of their own works of art or copyright over their own literary or artistic works as the VAT exemption only applies to tangible art.   | 288  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country | Status      | Latest development | Brief description  | Cite |
|---------|-------------|--------------------|--|------|
|         | ✓ Enacted   | December 21, 2023  | Effective January 1, 2023, Norway expanded the obligation for non-resident B2C digital services providers to all remote services and discontinued the current VAT exemption for electronic news services.  | 289  |
|         | ✓ Enacted   | June 29, 2023      | On June 29, 2023, the Norwegian Tax Administration published Tax Appeals Board Decision No. SKNS1-2023-30, in which the Tax Appeals Board observed that it strongly doubts whether participating in a mining pool qualifies as a taxable activity, but in any case it would be a VAT exempt financial services activity.   | 290  |
|         | ● Proposed  | April 11, 2025     | On April 10, 2025, the Norwegian government proposed a new Law on Visitor Contribution to the parliament. The law would allow municipalities to voluntarily impose a three percent overnight accommodation tax on short-term stays to finance tourism-related public goods. The tax would apply to all providers of short-term accommodation, with tax collection responsibilities falling to the intermediary if the provider is not registered in the VAT Register.  | 291  |
| Oman    | ✓ Enacted   | October 14, 2020   | Effective April 1, 2021, Oman requires non-resident vendors of digital services to consumers (B2C) in Oman to register for and collect VAT, regardless of the sales amount.  | 292  |
|         | ✓ Enacted   | August 31, 2022    | In August 2022, the Omani Tax Authority (OTA) issued a guide to clarify the VAT treatment of supplies of goods and services made via electronic commerce (e-commerce). The guide clarifies, among other things, the VAT registration requirement for non-resident suppliers engaging in e-commerce activities who are obligated to collect VAT for their supplies to Oman; the sourcing rules; the person liable to collect VAT when sales are made through an intermediary; and the filing and recordkeeping obligations.   | 293  |
| OECD    | ● Announced | April 12, 2017     | On April 12, 2017, the OECD published the International VAT/GST Guidelines, which present a set of internationally agreed standards and recommended approaches to address the issues that arise from the uncoordinated application of national VAT systems in the context of international trade. They focus on trade in services and intangibles, which poses increasingly important challenges for the design and operation of VAT systems worldwide. They notably include the recommended principles and mechanisms to address the challenges for the collection of VAT on cross-border sales of digital products that had been identified in the context of the OECD/G20 Project on Base and Erosion and Profit Shifting (the BEPS Project).   | 294  |
|         | ● Announced | June 20, 2019      | On October 24, 2017, the OECD published a report on Mechanisms for the Effective Collection of VAT/GST, which provides new implementation guidance to promote the effective collection of VAT on cross-border sales. This guidance will support the consistent implementation of internationally agreed standards for the VAT treatment of cross-border trade.<br><br>On June 20, 2019, the OECD published a role on the Role of Digital Platforms in the Collection of VAT/GST on Online Sales, which provides practical guidance to tax authorities on the design and implementation of a variety of solutions for digital platforms, including e-commerce marketplaces, in the effective and efficient collection of VAT/GST on the digital trade of goods, services and intangibles. | 295  |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country  | Status | Latest development             | Brief description   | Cite |
|----------|--------|--------------------------------|---|------|
|          | ●      | Announced<br>April 19, 2021    | On April 19, 2021, the OECD published a report on the impact of the growth of the sharing and gig economy on VAT/GST policy and administration, which offers solutions for the application of VAT/GST to sharing and gig economy operators. The OECD report: (1) highlights the central role that sharing and gig economy platforms can play in providing information to tax authorities and collecting the VAT/GST on activities in the sharing and gig economy; (2) sets out the core components of a comprehensive VAT/GST policy strategy for tax authorities in response to sharing and gig economy growth; (3) analyzes the main business models of the sharing and gig economy and the challenges for VAT/GST collection and administration, and presents a range of measures to address these challenges; and (4) includes detailed guidance on effective solutions for sharing and gig economy platforms in providing information to tax authorities and in collecting the VAT/GST on the activities that they facilitate. | 296  |
|          | ●      | Announced<br>February 16, 2023 | On June 23, 2021, the OECD published a VAT digital toolkit for Latin America and the Caribbean. The toolkit provides detailed guidance to tax authorities in Latin America and the Caribbean on implementation strategies, policies, best practices, and legislations to secure VAT revenue in the space of e-commerce.<br><br>On March 10, 2022, the OECD published a similar VAT digital toolkit for the Asia-Pacific region.<br><br>On February 15, 2023, the OECD published a similar VAT digital toolkit for Africa.   | 297  |
|          | ✓      | Enacted<br>August 17, 2021     | On June 30, 2021, Pakistan published the Finance Act 2021, which came into effect on July 1, 2021. The Act requires, among other things, online marketplaces to withhold sales tax at 2 percent on the gross value of sales when made by non-active taxpayers. An “online marketplace” is defined as an electronic interface such as a marketplace, e-commerce platform, portal, or similar means, which facilitates the sale of goods, including third-party sales by: (a) controlling the terms and conditions of the sale; (b) authorizing the charge to the customers in respect of the payment for the supply; or (c) ordering or delivering the goods. These rules apply. Effective September 1, 2021, where the seller is in Pakistan, is unregistered under the Sales Tax Act, and the sales are made from Pakistan.  | 298  |
| Pakistan | ✓      | Enacted<br>July 1, 2021        | Effective July 1, 2021, the province of Balochistan expanded the list of taxable services subject to its sales tax to include services provided by online marketplaces. Consequently, marketplaces that provide facilitation services are required to register. An online marketplace is defined as an information technology platform run by an e-commerce entity or organization over an electronic network that acts as a facilitator in transactions that occur between a buyer and a seller or between a service provider and service recipient.   | 299  |
| Palau    | ✓      | Enacted<br>August 9, 2022      | Effective January 1, 2023, Palau implemented a 10 percent goods and services tax (PGST), which includes measures to impose tax on the provision of remote services to consumers in Palau. Non-residents are required to register if their sales exceed the registration threshold of \$300,000.<br><br>On July 25, 2022, the Palauan tax authority announced the launch of the consultation process for the draft PGST regulations.   | 300  |

# Taxation of the digitalized economy – indirect taxes

|          | ✓ Enacted  | ● Proposed / Announced | ✗ Proposal rejected  |      |
|----------|------------|------------------------|--|------|
| Country  | Status     | Latest development     | Brief description  | Cite |
| Panama   | ● Proposed | August 16, 2023        | The government of Panama recently announced that it is exploring measures to impose VAT on non-resident providers of digital services to level the playing field with traditional providers. Details of any potential measures are still pending.  | 301  |
| Paraguay | ✓ Enacted  | January 11, 2021       | Effective January 1, 2021, Paraguayan financial intermediaries, including credit and debit card providers, are required to add and withhold VAT when a Paraguayan user pays for digital services provided by non-residents.<br><br>On December 28, 2020, Paraguay published General Resolution No. 76-20, which specifies the types of digital services affected by the withholding requirement as follows: digital distribution of multimedia content (games, movies, music, videos, among others); data processing and storage in general, and the provision, development, or updating of software or applications in general; cable and satellite television; marketing and advertising; games of luck, chance, bets and the like; and educational services provided through technological platforms. Finally, the Resolution includes special rules for digital intermediation services for land transportation services, whereby, instead of a withholding performed by local financial intermediaries, a non-resident provider of the intermediation services must register with the tax administration within 10 business days of beginning activities in Paraguay. | 302  |
|          | ✓ Enacted  | August 25, 2023        | On August 23, 2023, the Paraguayan tax authority published Binding Consultation No. 392, clarifying that digital call centre services provided to a non-resident are not subject to VAT in Paraguay if they are not effectively used or exploited in Paraguay.   | 303  |
| Peru     | ✓ Enacted  | August 26, 2024        | Effective December 1, 2024, Peru requires non-resident vendors of digital services to consumers (B2C) in Peru to register for and collect VAT, regardless of the sales amount.   | 304  |
|          | ✓ Enacted  | September 13, 2024     | On September 13, 2024, Peru published Legislative Decree No. 1644, which introduces a 1 percent excise tax on remote games and sports betting performed through digital platforms developed by non-resident entities if the player resides in Peru. The effective date is subject to pending regulations.  | 305  |
|          | ✓ Enacted  | February 3, 2025       | On January 21, 2025, the Peruvian tax authority published Superintendency Resolution No. 000010-2025/SUNAT, which establishes the online filing for the Tax on Remote Gaming and Sport Betting (Tax on RGSB) and Excise Duty on Remote Gaming and Sport Betting (Excise Duty on RGSB). Non-resident taxpayers and withholding agents must use the "Declaración y Pagos para No Domiciliados" platform, while resident taxpayers and withholding agents should use "Mis Declaraciones y Pagos" on the "Clave SOL" website, adhering to the respective schedules. Filings must be submitted using Virtual Form "0969" in specific scenarios, such as when revenues are received, prizes awarded, currency type selection, or tax payment adjustments.  | 306  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country     | Status    | Latest development | Brief description  | Cite |
|-------------|-----------|--------------------|--|------|
| Philippines | ✓ Enacted | October 26, 2021   | On August 16, 2021, the Bureau of Internal Revenue of the Philippines (BIR) issued Revenue Memorandum Circular (RMC) 97-2021 reminding social media influencers that they are liable for income tax and percentage tax or VAT.<br><br>On October 26, 2021, the Philippines Department of Finance issued a circular announcing that the BIR has been instructed to establish a dedicated unit to track online sales of goods and services and coordinate with tax authorities in other countries to determine how to properly tax such transactions.  | 307  |
|             | ✓ Enacted | October 3, 2024    | On October 3, 2024, the Philippines passed Republic Act No. 12023 requiring non-residents (including online platforms) providing digital services to consumers (B2C) in the Philippines to register for and collect VAT if their sales exceed PHP 3 million in any 12-month period. The law will take effect on October 18, 2024, and the tax authorities will have 90 days to issue implementing regulations. The compliance requirement will begin 120 days from the issuance of the regulations to regulations (by June 1, 2025, at the latest).  | 308  |
|             | ✓ Enacted | February 3, 2025   | On January 27, 2025, the Bureau of Internal Revenue (BIR) of the Philippines issued Revenue Regulation No. 03-2025, detailing the application of VAT on digital services as per Republic Act No. 12023. The regulation defines "digital services" as automated services delivered via the internet or electronic networks, including online platforms and cloud services, taxable at a 12% rate within the Philippines. The criteria for sourcing transactions include payment methods, billing addresses, and other location indicators. Non-resident digital service providers (DSPs) must register with the BIR within 60 days and are subject to VAT 120 days post-regulation. They can appoint a local representative for tax matters but aren't required to have one. Local DSPs must manage VAT obligations and handle VAT for non-resident sellers on their platforms. Non-resident DSPs must file VAT returns electronically and pay VAT due within 25 days after each quarter ends. Non-compliance may result in penalties, including criminal charges and possible business suspension. | 309  |
|             | ✓ Enacted | April 30, 2025     | On April 25, 2025, the Philippine Bureau of Internal Revenue (BIR) issued Revenue Regulation No. 14-2025, which mandates VAT on Non-resident Digital Services Providers (NRDSPs). (For KPMG's previous discussion on the new VAT rules for non-resident digital services providers, <a href="#">click here</a> ). The regulation requires NRDSPs to register online with the BIR by June 1 and will be subject to VAT from June 2 onwards.   | 310  |

# Taxation of the digitalized economy – indirect taxes

| ✓ Enacted |            | ● Proposed / Announced |  | ✗ Proposal rejected |  |
|-----------|------------|------------------------|--|---------------------|--|
| Country   | Status     | Latest development     | Brief description  | Cite                |  |
|           | ✓ Enacted  | June 11, 2025          | On May 9, 2025, the Philippines Bureau of Internal Revenue (BIR) issued Revenue Memorandum Circular No. 47-2025, providing guidance through FAQs on the application of VAT on cross-border digital services. Non-resident providers of digital services (NRDSPs) must register by June 1, 2025, via the VAT on Digital Services (VDS) portal, or through the Online Registration and Update System (ORUS) if the portal is unavailable. The circular clarifies that NRDSPs must register even for exclusively B2B transactions and file tax returns accordingly. In business-to-business transactions, Philippine customers will withhold and remit the 12 percent VAT. The circular also extends VAT rules to teleconsultation platforms and specifies that e-marketplaces are not liable for VAT if payments are made directly to NRDSPs. In addition, on June 11, 2025, the BIR issued RMC No. 58-2025, which extends the deadline for registration of all non-resident digital services providers from June 1, 2025, to July 1, 2025 due to the unavailability of the VDS portal and the ORUS. | 311                 |  |
|           | ● Proposed | July 14, 2025          | On July 14, 2025, the Philippines House of Representatives accepted for consideration House Bill 1,351, proposing a ten percent tax on gross revenues of online gambling operators.  | 312                 |  |
| Poland    | ✓ Enacted  | January 1, 2019        | Effective May 1, 2004, Portugal requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Poland to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Poland applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 313                 |  |
|           | ✓ Enacted  | July 1, 2021           | Effective July 1, 2021, Poland requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Polish consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 314                 |  |
| Portugal  | ✓ Enacted  | January 1, 2019        | Effective July 1, 2003, Portugal requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Portugal to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Portugal applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 315                 |  |
|           | ✓ Enacted  | July 1, 2021           | Effective July 1, 2021, Portugal requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Portuguese consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 316                 |  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country     | Status     | Latest development | Brief description   | Cite |
|-------------|------------|--------------------|---|------|
| Puerto Rico | ✓ Enacted  | December 21, 2020  | On December 8, 2020, the Puerto Rico Treasury Department published new sales tax regulations implementing the law requiring marketplace facilitators to collect and remit sales tax. In April 2020, Puerto Rico enacted Act 40-2020, which imposed sales and use tax collection requirements on marketplace facilitators that facilitate sales to customers in Puerto Rico. According to the regulations, marketplace facilitators are considered withholding agents for “mail-order sales” to Puerto Rico residents. The term “mail-order sales” is defined to include the sale of tangible personal property, specific digital products, or enumerated taxable services. “Specific digital products” means electronically transferred digital audiovisual works, digital audio works, or other digital products, provided that a digital code that grants a digital buyer the right to obtain a product will be treated as a sale of a product. “Other digital products” includes greeting cards, images, video or electronic games or entertainment, group memberships to obtain exclusive electronic or audiovisual data, and any other product that could be considered a digital product. Marketplace facilitators without a physical location in Puerto Rico but making mail-order sales in excess of \$100,000 or at least 200 transactions in their business year or annual accounting period will be deemed to have economic nexus with Puerto Rico. The marketplace facilitator tax collection requirements under Act 40-2020 took effect retroactively to January 1, 2020, and marketplace facilitators with nexus will be subject to penalties if they fail to register as merchants with the Department. The regulations specify, however, that the PRTD will not impose penalties on marketplace facilitators if they register on or before December 31, 2020. | 317  |
|             | ✗ Rejected | November 5, 2022   | On January 28, 2022, the Puerto Rico Treasury Department (“PRTD”) issued a proposed Regulation to continue to expand and clarify the Sales and Use Tax (“SUT”) rules of certain digital goods. If approved, NFTs will become part of the definition of specific digital products. In addition, the proposal makes a distinction between digital transfers and deliveries. The term “transferred” includes downloading an internet product, streaming, receiving a product via email. The term “delivered” includes the delivery by download, e-mail or any other method; while electronically transferred, the delivery is made by accessing on-line, generally with a password or code. The proposed regulation was not approved and the PRTD is working on a new version.   | 318  |
| Romania     | ✓ Enacted  | January 1, 2019    | Effective January 1, 2007, Romania requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Romania to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Romania applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 319  |
|             | ✓ Enacted  | July 1, 2021       | Effective July 1, 2021, Romania requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Romanian consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 320  |
| Russia      | ✓ Enacted  | August 11, 2016    | Effective January 1, 2017, Russia requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Russia to register for and collect VAT, regardless of the sales amount   | 321  |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted

● Proposed / Announced

✗ Proposal rejected

| Country | Status      | Latest development | Brief description   | Cite |
|---------|-------------|--------------------|---|------|
|         | ✓ Enacted   | December 22, 2017  | Effective January 1, 2019, Russia requires non-resident vendors (including online platforms) of digital services to business customers (B2B) in Russia to register for and collect VAT, regardless of the sales amount.   | 322  |
|         | ✓ Enacted   | February 11, 2021  | On July 31, 2020, Russia published Federal Law No. 265-FZ, which amends the scope of the VAT exemption applicable to the sale of exclusive rights to software and databases and to the rights to use them based on a license agreement effective January 1, 2021. The VAT exemption applies to the provision of the right to use software and databases (including updates and additional functionality) that are listed in the unified register of Russian software and database, thus excluding non-Russian software and databases from the scope of the exemption. The VAT exemption does not apply if the right to use the software or database consists of the receipt of an opportunity to disseminate advertising information via the internet and/or to receive access to it; to post offers regarding the acquisition (sale) of goods (including services), property rights on the internet; to search for information on potential buyers (sellers) and/or to conclude transactions (in general, advertising software).<br><br>The Russian tax authority further issued clarifications regarding changes to the VAT exemption for licenses of software and databases, including explanation of the transition to the new rules and how the VAT exemption is to apply if the software is included in the unified register of Russian programs for computers and databases. | 323  |
|         | ✓ Enacted   | October 15, 2020   | Effective January 1, 2021, Russia applies the reduced VAT rate of 10 percent on the sale of e-books and audio books related to education, science, and culture.   | 324  |
|         | ✓ Enacted   | July 8, 2021       | Russia announced a new law that introduces requirements for foreign IT companies that may affect the application of its VAT law. The law requires foreign IT companies that meet certain criteria to among others, create a branch, representative office, or a subsidiary in Russia which will have the authority to represent the company. A foreign IT company that provides e-services in Russia through a branch is generally not allowed to use the simplified VAT registration mechanism for non-residents.  | 325  |
|         | ✓ Enacted   | February 15, 2023  | On December 5, 2022, the Russian Ministry of Finance published Guidance Letter 03-03-06/1/118755 clarifying that digital mining transactions are subject to VAT at the general rate of 20 percent.  | 326  |
|         | ● Proposed  | October 2, 2025    | On October 2, 2025, Russia's Ministry of Finance published draft amendments to the Tax Code proposing VAT rules for imported e-commerce goods purchased by individuals through online platforms. If the value of goods is below the Eurasian Economic Union's customs duty-free threshold, VAT would be collected by the foreign or Russian platform acting as a tax agent and remitted monthly. For goods exceeding the threshold, buyers must pay VAT before registering the customs declaration. The VAT rate would be phased in as follows: five percent in 2027, 10 percent in 2028, 15 percent in 2029, and 20 percent from 2030.   | 327  |
| Rwanda  | ● Announced | March 11, 2022     | On March 11, 2022, Rwanda announced that it plans to introduce a law requiring non-resident vendors of digital service to Rwandan customers to register for VAT.  | 328  |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country      | Status    | Latest development | Brief description  | Cite |
|--------------|-----------|--------------------|--|------|
| Saudi Arabia | ✓ Enacted | August 2, 2017     | Effective January 1, 2018, Saudi Arabia requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Saudi Arabia to register for and collect VAT, regardless of the sales amount.   | 329  |
|              | ✓ Enacted | August 30, 2021    | On March 2, 2021, the Zakat, Tax and Customs Authority (ZATCA) of Saudi Arabia published VAT guidelines for online stores in which it clarified that online stores whose annual sales exceed SAR 375,000 must: (1) obtain commercial registration; (2) register for VAT and display the VAT certificate on their online platform; and (3) file tax returns and pay tax liabilities. Online stores are digital platforms that are engaged in commercial activities through websites, social media platforms, instant messaging applications, and shopping applications.<br><br>On August 30, 2021, the ZATCA issued guidelines on the VAT treatment of e-commerce transactions. The guidelines clarify the VAT implications of different e-commerce business models including that e-commerce booking services would be subject to VAT based on the underlying transaction. | 330  |
|              | ✓ Enacted | April 29, 2025     | On November 19, 2024, Saudi Arabia's Zakat, Tax and Customs Authority (ZATCA) amended the VAT Regulations, clarifying the tax obligations of online marketplaces. In April 2025, ZATCA released a guide detailing these changes, defining online marketplaces as digital platforms enabling suppliers to offer products and clarifying their role as undisclosed agents in VAT transactions. Effective January 2026, the VAT obligations will expand, requiring marketplaces acting as intermediaries for unregistered resident sellers to handle VAT collection and payment, creating two transactions: one from the resident supplier to the marketplace and another from the marketplace to the customer.   | 331  |
| Senegal      | ✓ Enacted | June 6, 2024       | Effective July 1, 2024, Senegal requires non-resident vendors of digital services to customers (B2C and B2B) in Senegal to register for and collect VAT, regardless of the sales amount.   | 332  |
| Serbia       | ✓ Enacted | May 31, 2016       | Effective January 1, 2017, Serbia requires non-resident vendors of digital services to consumers (B2C) in Serbia to register for and collect VAT, regardless of the sales amount.  | 333  |
| Sierra Leone | ✓ Enacted | May 19, 2023       | Effective January 1, 2021, Sierra Leone introduced a GST collection obligation for digital platforms facilitating the sale of digital services to customers in Sierra Leone. The tax authority has yet to issue guidelines on the implementation of the new rules.<br><br>Effective April 1, 2023, Sierra Leone amended its GST act to, among other things, include in the scope of digital services subject to GST satellite television and online or digital gambling and betting activities.  | 334  |
| Singapore    | ✓ Enacted | December 10, 2021  | Effective January 1, 2020, Singapore requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Singapore to register for and collect VAT if their sales exceed SGD 1 million worldwide and SGD 100,000 of taxable sales in Singapore in a 12-month period.<br><br>Effective January 1, 2023, Singapore expanded the scope of services to all remotely provided services.  | 335  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country  | Status    | Latest development | Brief description  | Cite |
|----------|-----------|--------------------|--|------|
|          | ✓ Enacted | December 31, 2019  | Effective January 1, 2020, the use of digital payment tokens as payment for goods or services is outside the scope of GST, and the exchange of digital payment tokens for fiat currency or other digital payment tokens is exempt from GST.  | 336  |
|          | ✓ Enacted | December 10, 2021  | Effective January 1, 2023, non-resident vendors (including online platforms) selling low value consignments of goods valued below SGD 400 to Singaporean consumers (B2C) must register for and collect GST if their sales exceed SGD 1 million worldwide and SGD 100,000 of taxable sales in Singapore in a 12-month period.   | 337  |
| Slovakia | ✓ Enacted | January 1, 2019    | Effective May 1, 2004, Slovakia requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Slovakia to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Slovakia applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.                                 | 338  |
|          | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Slovakia requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Slovak consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 339  |
|          | ✓ Enacted | May 31, 2023       | On May 30, 2023, the Slovak tax authority issued guidance No. 4/DPH/2023/MU on the application of VAT in transactions involving cryptocurrencies. The guidance defines cryptocurrency for VAT purposes and states that the supply of goods or services remunerated in cryptocurrencies will be treated in the same way as any other supply in accordance with the practice in the European Union. The guidance also clarifies that the exchange of cryptocurrencies and digital wallet services for consideration should be exempt from VAT. | 340  |
| Slovenia | ✓ Enacted | January 1, 2019    | Effective May 1, 2004, Slovenia requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Slovenia to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Slovenia applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.                                 | 341  |
|          | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Slovenia requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Slovene consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 342  |



# Taxation of the digitalized economy – indirect taxes

| ✓ Enacted    |        | ● Proposed / Announced |                   | ✗ Proposal rejected  |      |
|--------------|--------|------------------------|-------------------|--|------|
| Country      | Status | Latest development     | Brief description |  | Cite |
| South Africa | ✓      | Enacted                | December 10, 2021 | <p>Effective June 1, 2014, South Africa requires non-resident vendors of digital services to customers (B2C and B2B) in South Africa to register for and collect VAT, if their sales exceed ZAR 50,000 in a 12-month period.</p> <p>Effective April 1, 2019, South Africa expanded the scope of digital services falling within the scope of the non-resident digital services rules, introduced VAT collection obligations for intermediaries in digital services transactions (e.g., online platforms), and increased the VAT registration threshold for non-resident digital services providers from ZAR 50,000 to ZAR 1 million.</p> <p>On March 18, 2019, South Africa published regulations prescribing electronic services for purpose of defining "electronic services" in section 1 of VAT Act. According to the regulations, "electronic services" means any services supplied by means of an electronic agent, electronic communication, or the internet for any consideration, other than (a) educational services, (b) telecommunications services; or (c) intra-group services.</p> <p>On December 10, 2021, South Africa issued a regulation on new changes to the VAT invoice requirements for non-resident digital service providers. The new requirements will amongst others, require that the following be included in the invoice, the VAT registration number of service recipient, a full and proper description of the service, and the exchange rate used (when services are provided in currency other than South African Rand).</p> | 343  |
|              | ✓      | Enacted                | September 2, 2022 | <p>On August 3, 2022, the South African Revenue Service (SARS) published a VAT guide for non-resident digital services providers. The guide addresses the following: (1) completing the application for registration for VAT; (2) completing the VAT vendor declaration; and (3) requesting a VAT registration to be cancelled in cases where the value of electronic services supplied has not exceeded the ZAR 1 million threshold in a period of 12 months.</p> <p>On April 14, 2023, the SARS published an update to the VAT guide for non-resident digital services providers. The latest update is to ensure that a supplier of electronic services by a foreign suppliers and foreign intermediaries are not registering for VAT due to an exception when calculating the ZAR 1 million threshold.</p>  | 344  |
|              | ✓      | Enacted                | April 2, 2025     | <p>Effective April 1, 2025, South Africa excludes from the scope of its non-resident VAT digital services rules business-to-business (B2B) transactions if the non-resident only sells to registered vendors in South Africa. Additionally, new rules for digital platform intermediaries specify that sales of digital services through an intermediary platform are deemed made by the intermediary if the intermediary is a vendor, the principal is a non-resident, and both parties agree to this arrangement. Intermediaries are responsible for VAT on sales made on behalf of foreign suppliers, with joint liability for compliance and tax payment under the VAT Act.</p>  | 345  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country     | Status     | Latest development | Brief description  | Cite |
|-------------|------------|--------------------|--|------|
|             | ● Proposed | August 19, 2025    | On August 16, 2025, South Africa's National Treasury released the Draft Taxation Laws Amendment Bill 2025 for public comment, proposing several changes to indirect tax legislation. Key measures include expanding Section 54(2B) of the VAT Act so marketplace intermediaries (for example, platforms or agents) can account for VAT on digital services they facilitate for both foreign and local vendors effective April 1, 2026.   | 346  |
| South Korea | ✓ Enacted  | August 11, 2015    | Effective July 1, 2015, South Korea requires non-resident vendors of certain digital services to consumers (B2C) in South Korea to register for and collect VAT, regardless of the sales amount.   | 347  |
|             | ✓ Enacted  | December 20, 2018  | Effective July 1, 2019, South Korea expanded the scope of digital services falling within the scope of the non-resident digital services rules to include advertising services, cloud computing services, and intermediary online-to-offline services effective July 1, 2019.  | 348  |
|             | ✓ Enacted  | January 8, 2024    | In December 2023, South Korea adopted amendments to its tax law which, among other things, introduce new enforcement provisions relating to non-compliant non-resident digital services providers. The amendments allow the relevant tax office to (1) investigate and register non-resident digital services providers at their discretion; and (2) impose a penalty equivalent to 1 percent of the total value of sale during the unregistered period.   | 349  |
| Spain       | ✓ Enacted  | January 1, 2019    | Effective July 1, 2003, Spain requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Spain to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Spain applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.   | 350  |
|             | ✓ Enacted  | July 1, 2021       | Effective July 1, 2021, Spain requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Spanish consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 351  |
|             | ✓ Enacted  | May 31, 2022       | On March 10, 2022, the General Directorate of Taxes (GDT) published Ruling V0486-22 clarifying that NFTs should not be classified as a delivery of goods, since the object of the transaction was the digital certificate of authenticity that represents the NFT, without a physical delivery of the image file or the digital file associated with it. The GDT distinguishes between two types of digital assets in the process of creating the NFT: (1) the underlying digital file — in this case, an image edited with Photoshop; and (2) the token itself, which represents the digital property of the underlying digital file. The GDT concluded that the transfer of the NFT implied the provision of digital art services and, accordingly, it should be classified as digital services subject to VAT at the standard VAT rate. Finally, the held that if such NFTs are sold through a online marketplace, the marketplace should be liable to collect VAT on the underlying NFT. | 352  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country   | Status    | Latest development | Brief description  | Cite |
|-----------|-----------|--------------------|--|------|
| Sri Lanka | ✓ Enacted | April 21, 2025     | On Aril 11, 2025, Sri Lanka adopted Value Added Tax (Amendment) Act No 04 of 2025, which, among other things, requires non-resident digital services providers to register for and collect VAT effective October 1, 2025. The Act empowers the Commissioner General of Inland Revenue (CGIR) to prescribe the procedure for registration, payment, and compliance requirements.  | 353  |
|           | ✓ Enacted | September 8, 2025  | On July 1, 2025, Sri Lanka published Notification No. 2443/30 outlining VAT procedures for non-resident providers of digital services through electronic platforms. Non-resident entities must register for VAT and charge 18 percent VAT on digital services sold to Sri Lankan consumers. Registration is mandatory if the value of services exceeds LKR 60 million in the past 12 months or LKR 15 million in the past three months. The Notification lists examples of taxable digital services, including streaming, cloud computing, and online marketplaces. Registered suppliers must obtain a taxpayer identification number (TIN), issue VAT-compliant invoices, retain records for five years, and file VAT returns electronically. Penalties apply for noncompliance, and the order also outlines procedures for cancellation of registration.<br><br>On September 3, 2025, Sri Lanka's Cabinet approved the postponement of the non-resident VAT digital services rules from October 1, 2025 to April 1, 2026.  | 354  |
| Suriname  | ✓ Enacted | August 31, 2022    | Effective January 1, 2023, Suriname will require non-resident service providers to register for and collect VAT on the provision of the following services to consumers in Suriname: (1) the transfer and granting of copyrights, patents, licensing rights, trademarks and similar rights; (2) advertising services; (3) services provided by consultants, engineers, consultancies, lawyers, accountants and other similar services, as well as data processing and disclosure; (4) the obligation not to exercise, in whole or in part, a professional activity or a right referred to in this Article; (5) banking, financial and insurance operations, including reinsurance operations and except for the hire of safes; (6) the provision of staff; (7) the rental of movable tangible property, except for all means of transport; (8) telecommunication services; (9) radio- on television broadcasting services; and (10) electronic services. The law includes a registration threshold of SRD 500,000 for non-resident providers of digital services but does not include any such threshold for the other remotely provided services. | 355  |
| Sweden    | ✓ Enacted | January 1, 2019    | Effective July 1, 2003, Sweden requires non-EU vendors (including online platforms) of digital services to consumers (B2C) in Sweden to register for and collect VAT, regardless of the sales amount. The obligation was expanded to EU-established digital services providers effective January 1, 2015.<br><br>Effective January 1, 2019, Sweden applies a VAT registration threshold of EUR 10,000 for EU-established digital services providers. The threshold does not apply to non-EU businesses.  | 356  |
|           | ✓ Enacted | July 1, 2021       | Effective July 1, 2021, Sweden requires non-resident vendors (including online platforms) selling low value consignments of goods valued below EUR 150, which are directly shipped from outside the EU to Swedish consumers (B2C), to register for and collect VAT, regardless of the sales amount.  | 357  |
|           | ✓ Enacted | March 1, 2019      | Effective March 1, 2019, PostNord collects VAT on behalf on non-residents selling low value consignments of goods to B2C customers (i.e., goods imported from non-EU countries).   | 358  |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country     | Status | Latest development | Brief description | Cite   |     |
|-------------|--------|--------------------|-------------------|--|-----|
|             | ✓      | Enacted            | June 1, 2023      | On June 1, 2023, the Swedish tax authority updated its VAT guidance on banking and financial services clarifying that digital currencies stored and transferred using digital wallets are exempt from VAT if the transactions with digital currencies are equivalent to legal means of payment.  | 359 |
|             | ✓      | Enacted            | April 2, 2024     | On March 28, 2024, the Swedish tax authority issued a ruling clarifying the VAT treatment of non-fungible tokens (NFTs) linked to a digital work. The ruling defines NFTs as unique blockchain records signifying ownership of specific assets. It explains that an NFT typically includes two components: the ownership of the digital work and the NFT itself, both of which are interdependent and represent a single transaction for VAT purposes. This combination constitutes a new digital service. The ruling also addresses instances where the transfer of an NFT includes copyright, stating that if the copyright is not linked to the NFT, it is considered two separate transactions. However, if the NFT represents both the ownership and its copyright, a case-by-case evaluation is required.  | 360 |
| Switzerland | ✓      | Enacted            | June 23, 2020     | Effective January 1, 2010, Switzerland requires non-resident vendors of digital services to consumers (B2C) in Switzerland to register for and collect VAT if their sales exceed CHF 100,000 in a 12-month period.<br><br>Effective January 1, 2018, Switzerland amended the computation method of the VAT registration threshold for non-resident digital services providers so that the CHF 100,000 threshold applies on a worldwide income.<br><br>Effective January 1, 2019, Switzerland expanded the new threshold computation to non-resident suppliers of low-value consignments (i.e., goods where the amount of import VAT does not exceed CHF 5), thus requiring such businesses also to register for and collect VAT.<br><br>On June 23, 2020, the Swiss Federal tax Administration published an updated guide on VAT and electronic services, which include several material changes. The updated guidance clarifies the scope of the digital services rules and includes practical examples of what is considered a digital service for VAT purpose, including for digital platforms.                               | 361 |
|             | ✓      | Enacted            | August 27, 2024   | On June 16, 2023, the Swiss Parliament approved new VAT provisions, including the implementation of a deemed supplier rule for products sold through digital platforms (marketplaces). Under the regime, sellers will not charge VAT to the marketplace (zero rate) but they will have a subsidiary liability for the tax due by the marketplace. The marketplace's fee will be deemed to be a (taxable) consideration for the service provided by the marketplace. Moreover, marketplaces can elect for the deferral regime for importations (i.e., declare import VAT with the VAT return instead of paying it at customs). Finally, while electronic services are currently not in the scope, a separate piece of legislation will be prepared to include electronic services in a few years. The enactment date is yet to be determined by the Federal Council and expected to be January 1, 2025.<br><br>On August 22, 2024, Switzerland published Law No. FF 2024 438, which, among other things, introduce new VAT collection obligations for digital platforms facilitating the sale of goods effective January 1, 2025. | 362 |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country    | Status | Latest development | Brief description | Cite   |     |
|------------|--------|--------------------|-------------------|--|-----|
|            | ✓      | Enacted            | November 6, 2023  | On August 29, 2023, the Swiss Federal Administrative Court (SFAC) clarified the VAT treatment for validation/verification activities in blockchain networks (Case A-5638/2022). The SFAC concluded that the recipient of the validation or verification activities is the service recipient and that these activities should be treated independently for VAT purposes. The court ruled that the transaction processing, for which the validator collected a transaction fee, is a taxable service, while the remaining validation/verification activities provided to the blockchain network, for which the validator received block rewards, are non-taxable.  | 363 |
|            | ✓      | Enacted            |                   | On January 28, 2025, the Swiss tax authorities released final guidelines for platform rules concerning goods, effective from January 1, 2025. Under Article 20a of the Swiss VAT Act, any entity, Swiss or foreign, that facilitates the sale of goods through an electronic interface is treated as the seller for VAT purposes, implying they purchase goods from the original seller and resell them to the customer. Platforms must meet specific criteria, such as managing customer data and processing payments, to be considered facilitators. The rules apply to all sales, including domestic and international transactions, with platforms required to register for VAT if annual non-exempt transactions exceed CHF 100,000. Platforms must issue VAT compliant invoices and maintain transaction records for ten years. Additionally, they must provide information to the Swiss tax authorities upon request. | 364 |
| Taiwan     | ✓      | Enacted            | March 22, 2017    | Effective May 1, 2017, Taiwan requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Taiwan to register for and collect VAT if their sales exceed TWD 480,000 in a 12-month period.  | 365 |
|            | ✓      | Enacted            | October 29, 2019  | Effective January 1, 2019, non-resident VAT registered digital services providers are required to issue government compliant e-invoices.<br>On July 16, 2018, the Ministry of Finance of Taiwan released a tax ruling stating that while foreign e-service suppliers are required to issue e-GUI starting from January 1, 2019, relevant penalties for failing to issue e-GUI will not apply for the first year.   | 366 |
|            | ✓      | Enacted            | August 18, 2023   | On August 11, 2023, Taiwan's National Tax Bureau announced that VAT should be collected on sales of virtual items and virtual wealth gained in online games. Platform facilitating the sale of such intangibles are responsible to collect VAT on the full consideration received and are required to issue an e-invoice to the buyer. Taxpayers who acquire such items or wealth must obtain an invoice to be able to claim input VAT credits on subsequent sales.  | 367 |
|            | ✓      | Enacted            | April 10, 2025    | Effective April 7, 2025, Taiwan raised the VAT registration threshold for non-resident digital services providers from TWD 480,000 to TWD 600,000.   | 368 |
| Tajikistan | ✓      | Enacted            | January 13, 2021  | Effective January 21, 2021, Tajikistan requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Tajikistan to register for and collect VAT, regardless of the sales amount.  | 369 |

# Taxation of the digitalized economy – indirect taxes

|          |                | ✓ Enacted          | ● Proposed / Announced | ✗ Proposal rejected   |      |  |
|----------|----------------|--------------------|------------------------|---|------|--|
| Country  | Status         | Latest development |                        | Brief description   | Cite |  |
| Tanzania | ✓ Enacted      | July 12, 2023      |                        | Effective July 1, 2015, Tanzania requires non-resident vendors of digital services to consumers (B2C) in Tanzania to register for and collect VAT if their sales exceed TZS 100 million.<br><br>Effective July 1, 2022, Tanzania implemented a simplified registration process for non-resident digital services providers. While Tanzania's VAT digital services regime has been in effect since July 1, 2015, the regulations implementing the new VAT registration mechanism state that "a non-resident person who supplies electronic services in Mainland Tanzania prior to the coming into effect of these Regulations shall, within six months from the date of coming into effect, be required to register under these regulations."<br><br>On June 30, 2023, Tanzania enacted the Finance Act 2023, which, among other things, expands the definition of digital services to include online intermediation services and online advertisement services.<br><br>In addition, non-resident digital services providers are also subject to the 2 percent digital services tax. | 370  |  |
|          | ● Announcement | February 28, 2023  |                        | On February 28, 2023, the Tanzania Revenue Authority published a Public Notice informing registered non-resident digital service providers that they must file returns through the new online simplified return filing and payment portal.  | 371  |  |
|          | ● Announcement | January 31, 2024   |                        | The Tanzanian Revenue Authority recently issued a public notice outlining the VAT and DST obligations of non-resident providers of cross-border electronic services. According to the notice, all non-resident providers of electronic services must register for VAT and DST voluntarily using a simplified registration framework developed by the TRA. The notice also provides a registration manual for this purpose.  | 372  |  |
|          | ✓ Enacted      | July 1, 2025       |                        | Effective July 1, 2025, Tanzania enacted its Finance Act 2025, which, among other things, clarifies that the term "online intermediation services," as included under the definition of "electronic services," now explicitly covers online accommodation marketplaces, and payment services platforms.   | 373  |  |
| Thailand | ✓ Enacted      | February 10, 2021  |                        | Effective September 1, 2021, Thailand requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Thailand to register for and collect VAT if their sales exceed THB 1.8 million in a 12-month period.   | 374  |  |
|          | ✓ Enacted      | March 8, 2022      |                        | On May 24, 2022, Thailand published two royal decrees exempting the trading of digital assets via licensed digital asset exchanges and transfers of a retail digital currency to be issued by the Bank of Thailand (BOT) from April 1, 2022, to December 31, 2023.  | 375  |  |

# Taxation of the digitalized economy – indirect taxes

|         | ✓ Enacted | ● Proposed / Announced | ✗ Proposal rejected |  |     |
|---------|-----------|------------------------|---------------------|--|-----|
| Country | Status    | Latest development     | Brief description   | Cite   |     |
|         | ✓         | Enacted                | November 28, 2022   | On June 28, 2022, Thailand introduced a 5-year VAT exemption for data hosting services, including: (1) the provision of servers and related equipment for the purpose of storing, processing, and connecting information through the internet; and (2) the provision of related support services for the above, including data backup services, network connection services, cloud services, and system management and information security services.<br><br>On November 9, 2022, the Thai Revenue Department published Royal Decree 759 regarding the VAT exemption to promote investments in data center businesses and establish Thailand as a digital hub in the region. The VAT exemption applies to qualified data business operators that comply with all rules, procedures, and conditions as prescribed by the Revenue Department and applied for the exemption within 5 years from the date the Royal Decree comes into force. | 376 |
|         | ✓         | Enacted                | August 18, 2023     | On August 15, 2023, Thailand published Royal Decree No. 779, which establishes corporate income tax and VAT exemptions for transfers of digital investment tokens effective August 16, 2023.   | 377 |
|         | ●         | Announcement           | March 11, 2024      | On February 14, 2024, the Thai Prime Minister reportedly requested the Ministry of Finance and the directors of the revenue and customs departments to consider applying VAT to low-value consignments, currently exempted, to address issues of false value declarations, cheap product dumping via online sources, and smuggling through false information to evade taxes.   | 378 |
|         | ✓         | Enacted                | September 27, 2024  | On September 24, 2024, Thailand published Royal Decree No. 788, which exempts from VAT cryptocurrency and utilization digital token transfers made through or by a digital asset broker or transferred to a digital asset trader in accordance with the Digital Asset Business Act.  | 379 |
| Türkiye | ✓         | Enacted                | April 15, 2018      | Effective January 1, 2018, Türkiye requires non-resident vendors of digital services to consumers (B2C) in Türkiye to register for and collect VAT, regardless of the sales amount.  | 380 |
|         | ✓         | Enacted                | February 28, 2025   | On February 27, 2025, Türkiye published General Communiqué No. 54, which, among other things, expands the VAT exemption for digital content creators to include individuals earning income from online courses, training, data processing, software development, and product promotion via internet platforms, effective January 1, 2024. This exemption applies if the income is taxed under the special regime of Article 20/B of the Individual Income Tax Law  | 381 |



# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country | Status    | Latest development | Brief description  | Cite |
|---------|-----------|--------------------|--|------|
| Uganda  | ✓ Enacted | July 14, 2021      | <p>Effective July 1, 2018, Uganda requires non-resident vendors of digital services to consumers (B2C) in Uganda to register for and collect VAT if their sales exceed UGX 150 million in a 12-month period.</p> <p>Uganda recently made amendments to its VAT regime as part of a broader 2021-22 Budget measures, which introduces a separate quarterly return filing for services provided by non-residents, including digital services.</p> <p>On July 7, 2022, the Uganda Revenue Authority issued a notice reminding non-resident digital services providers that they are required to register for VAT.</p> <p>On November 8, 2022, the Ugandan Revenue Authority published VAT FAQs for non-resident digital services providers. The FAQs clarify the registration and filing obligations of non-resident digital services providers, the services in scope of the rules, as well as the sourcing rules. According to the FAQs, the obligation for non-residents to register for and collect VAT is effective July 1, 2022.</p>  | 382  |
|         | ✓ Enacted | April 6, 2023      | <p>Effective July 1, 2023, Uganda amended the definition of digital services to include advertising platforms; streaming platforms and subscription-based services; cab-hailing services; cloud storage; data warehousing; and any other service as the Minister may by statutory instrument determine.</p>  | 31   |
| Ukraine | ✓ Enacted | September 30, 2022 | <p>Effective January 1, 2022, Ukraine requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Ukraine to register for and collect VAT if their sales exceed UAH 1 million.</p> <p>On November 1, 2021, Ukraine's State Fiscal Service (SFS) issued a guidance letter clarifying the scope of the digital services subject to the new non-resident VAT registration requirement.</p> <p>On December 23, 2021, the Ukrainian Ministry of Finance issued a regulation for the implementation of the new registration requirements for non-resident digital services providers and the procedures for registration. Among other things, the regulation announced that non-residents who are subject to the new rules are required to be registered by March 31, 2022.</p> <p>On September 28, 2022, the SFS issued a guidance letter clarifying the registration requirements for non-resident digital services providers, including when an intermediary is liable to register for, collect, and remit VAT rather than the underlying digital services provider.</p> <p>On October 31, 2022, the SFS published a guidance letter in which it clarified that a non-resident digital services provider is considered a VAT payer in Ukraine starting from the date of its VAT registration in Ukraine. If a non-resident is registered as a VAT payer not on the first day of reporting period (calendar quarter), the first reporting period for such non-resident VAT payer starts from the day of the VAT registration and ends on the last day of the following reporting period (calendar quarter). Payments for transactions performed before the VAT registration but received after such registration are not subject to the Ukrainian VAT. If a non-resident provides electronic services to individuals without registering for VAT purposes, the non-resident may be subject to a penalty of UAH 195,000.</p> | 384  |



# Taxation of the digitalized economy – indirect taxes

✓ Enacted
● Proposed / Announced
✗ Proposal rejected

| Country              | Status    | Latest development | Brief description   | Cite |
|----------------------|-----------|--------------------|---|------|
| United Arab Emirates | ✓ Enacted | December 1, 2017   | Effective January 1, 2018, the UAE require non-resident vendors of digital services to consumers (B2C) in the UAE to register for and collect VAT, regardless of the sales amount.  | 385  |
|                      | ✓ Enacted | February 28, 2023  | In August 2020, the Federal Tax Authority (FTA) of the UAE published an e-commerce VAT guide providing guidance on the VAT treatment of e-commerce sales of goods, the provision of digital services, and the VAT treatment of e-commerce platforms.  | 386  |
|                      | ✓ Enacted | January 16, 2025   | The Federal Tax Authority (FTA) of the United Arab Emirates (UAE) recently published Decision No. 99 of 2022 amending the UAE VAT executive regulations. Among other changes, Decision No. 99 requires taxable persons to keep records establishing the Emirate in which the supply is received if they are making taxable supplies above AED 100 million in a year through commerce.   | 387  |
| United Kingdom       | ✓ Enacted | January 1, 2019    | On February 22, 2023, the FTA published Clarification VATP033 providing the criteria and conditions for the electronic filing of UAE tax returns by qualified taxpayers.  | 388  |
|                      | ✓ Enacted | March 13, 2018     | On January 14, 2025, the Federal Tax Authority (FTA) of the United Arab Emirates published VAT Public Clarification (VATP039) regarding cryptocurrency mining, following the extension of VAT exemption to certain virtual asset activities as outlined in Cabinet Decision No. 100 of 2024. The FTA defines cryptocurrency mining as the use of specialized computers to validate blockchain transactions, potentially earning rewards. The clarification specifies that the VAT exemption for virtual assets does not cover cryptocurrency mining. It states that mining for others is a taxable service (either at 5 percent or 0 percent), depending on the fee arrangement. Conversely, mining for personal gain is not taxable due to the lack of a direct connection between the activity and the reward, and no identifiable service recipient. VAT related to costs incurred in mining for others is recoverable, but not for personal mining. Additionally, UAE businesses must apply the reverse charge mechanism for VAT if they receive mining services from a non-resident, and non-resident providers must register for VAT if supplying to UAE residents and final consumers. | 389  |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted

● Proposed / Announced

✗ Proposal rejected

| Country | Status    | Latest development | Brief description   | Cite |
|---------|-----------|--------------------|---|------|
|         | ✓ Enacted | February 24, 2020  | Effective January 1, 2021, the UK is no longer subject to the EU VAT rules. Therefore, non-resident vendors of digital services are no longer be subject to the EU-wide simplified Mini One-Stop Shop (MOSS) mechanism. Non-resident businesses selling digital services to consumers in the UK are thus required to register for UK VAT separately, even if they are already registered for MOSS in the UK. Non-EU businesses that have registered under MOSS in the UK for their EU digital services are also required to register for MOSS in another EU Member State in case of Brexit.   | 390  |
|         | ✓ Enacted | December 8, 2020   | Effective January 1, 2021, the UK requires non-resident vendors (including online platforms) selling low value consignments of goods valued below GBP 150, which are directly shipped from outside the UK to UK consumers (B2C), to register for and collect VAT, regardless of the sales amount.   | 391  |
|         | ✓ Enacted | June 9, 2023       | Effective May 1, 2020, VAT on digital publications are zero-rated.<br><br>On March 11, 2021, HMRC published Revenue and Customs Brief 3 (2021): VAT liability of digital publications in which it clarified that supplies of digital publications before May 1, 2020, are standard rated. As HMRC's policy has not changed, any claims made in reliance of the Upper Tribunal decision in <i>News Corp</i> will be rejected.<br><br>On February 22, 2023, the UK Supreme Court published its judgment in <i>News Corp</i> in which it confirmed HMRC's position that digital publications could not be zero-rated before the law changes effective May 1, 2020.<br><br>On June 8, 2023, HMRC published Revenue and Customs Brief 6 (2023) providing an update on the VAT treatment of sales of digital newspapers and other digital publications before May 1, 2020 following the UK Supreme Court decision in <i>News Corp</i> . HMRC stated it intends to write to organizations that have submitted claims for overpaid VAT based on the Upper Tribunal decision in <i>News Corp</i> (UT/2018/0046) to confirm whether they intend to proceed with their appeals given the Supreme Court decision. | 392  |
|         | ✓ Enacted | August 23, 2023    | On August 23, 2023, the UK's First-tier Tribunal held in <i>All Answers Ltd.</i> that a platform company facilitating the sale of academic papers, was acting as a principal, not an agent, for VAT purposes and was therefore liable to collect VAT on the sale of the academic papers and not only on its intermediation services.  | 393  |
|         | ✓ Enacted | December 15, 2023  | On December 15, 2023, the UK First-Tier Tribunal ruled in <i>Bolt Services UK Ltd.</i> that ride-sharing services are eligible for the VAT regime applicable to travel agencies and tour operators, known as the tour operators' margin scheme (TOMS), due to their similarity to services offered by these entities.   | 394  |

# Taxation of the digitalized economy – indirect taxes

✓ Enacted
● Proposed / Announced
✗ Proposal rejected

| Country | Status      | Latest development | Brief description  | Cite |
|---------|-------------|--------------------|--|------|
|         | ● Announced | January 26, 2024   | The UK tax authority recently began contacting UK VAT-registered businesses selling goods through online marketplaces to verify whether they are established in the UK. In particular, the tax authority has been contacting businesses registered at their agent's address, or a service office contacted to provide evidence of their UK establishment or to confirm their status as a non-established taxpayer (NETP). The initiative aims to ensure correct VAT administration by online marketplaces, as VAT should be withheld by these platforms on sales made by NETPs and remitted directly to HMRC.  | 395  |
|         | ✓ Enacted   | March 25, 2025     | On March 24, 2025, the Upper Tribunal dismissed an appeal by the UK tax authority (HMRC) against Bolt Services UK Limited regarding the applicability of the Tour Operators' Margin Scheme (TOMS) for VAT on Bolt's mobile ride-hailing services. TOMS is a special VAT accounting mechanism designed for businesses that buy and resell travel services as part of a tour package. It simplifies VAT obligations for tour operators and travel agents by allowing them to account for VAT only on the margin—the difference between the cost of services purchased and the selling price to the consumer. The Tribunal held that Bolt's services were comparable to those typically provided by tour operators or travel agents and were provided for the direct benefit of travelers without material alteration or further processing. The Tribunal found no error in the First-tier Tribunal's decision, confirming that Bolt's ride-hailing services fall within the scope of TOMS.                             | 396  |
|         | ● Proposed  | April 29, 2025     | On May 6, 2025, the UK's Treasury opened a consultation on the tax treatment of remote gambling. The consultation proposes the introduction of a single remote gambling tax, called the Remote Betting & Gaming Duty (RBGD), which would simplify the current three-tax system. The RBGD would apply to all remote gambling, including betting and gaming activities offered remotely, such as online casino, bingo, and general and pool betting. The consultation also seeks stakeholders' views on the treatment of free bets, freeplays, and prizes, as well as the registration, returns, and sanctions related to the proposed tax. If approved, the new tax could come into effect in October 2027 or later.  | 397  |
|         | ✓ Enacted   | July 7, 2025       | On June 20, 2025, the UK's tax authority, HMRC issued guidance stating that online marketplaces are responsible for VAT on goods sold by overseas businesses when those goods are located in the UK at the point of sale. Marketplace operators must take reasonable steps to determine if a seller is established outside the UK, tailoring their approach based on factors like business size and risk systems. While HMRC does not mandate specific checks, it provides examples to guide marketplaces in assessing a seller's UK establishment status. These include verifying the seller's principal place of business, VAT registration, Companies House registration, director residency, financial information, commercial background, geolocation data, and UK phone number. Platforms must retain evidence of these checks, as HMRC may request it to evaluate the adequacy of the actions taken. If indicators suggest uncertainty about a seller's UK establishment, further checks should be conducted. | 398  |

# Taxation of the digitalized economy – indirect taxes

|               |        | ✓ Enacted | ● Proposed / Announced | ✗ Proposal rejected   |      |
|---------------|--------|-----------|------------------------|---|------|
| Country       | Status |           | Latest development     | Brief description   | Cite |
| United States | ✓      | Enacted   | September 1, 2019      | Under state-level rules, remote sellers are required to collect and remit tax on sales made to in-state customers if they meet the state specified sales thresholds (often \$100,000 in sales or 200 transactions). Economic nexus rules affect all companies exceeding the state-specific sales threshold, including those not resident in the U.S. Depending on the state, the seller may also be required to collect tax on sales of services and digital goods, in addition to sales of tangible property. Additionally, all states with a sales tax require electronic marketplaces that meet the specified sales threshold to collect tax on sales they facilitate. Generally, a marketplace is defined as an entity that advertises products for sale by others and that collects payment from the customer, but state definitions differ. | 399  |
| Uruguay       | ✓      | Enacted   | July 27, 2018          | Effective January 1, 2018, non-resident providers of audio-visual services and intermediation services to customers (B2C and B2B) in Uruguay are required to register for and collect VAT, regardless of the sales amount.  | 400  |
|               | ✓      | Enacted   | October 1, 2025        | On October 1, 2025, Uruguay's General Directorate of Taxation published Consultation No. 6679, clarifying the VAT treatment of a subscription service offered by a Swiss entity without a permanent establishment in Uruguay. The service, which includes audiovisual content such as recipes and tutorials, was deemed subject to VAT when consumed in Uruguay. Although the income qualifies as business profits taxable in Switzerland under the 2010 Uruguay-Switzerland tax treaty and is not subject to Uruguay's nonresident income tax (IRNR), Uruguayan VAT applies due to the nature of the digital content.  | 401  |
| Uzbekistan    | ✓      | Enacted   | January 1, 2020        | Effective January 1, 2020, Uzbekistan requires non-resident vendors (including online platforms) of digital services to consumers (B2C) in Uzbekistan to register for and collect VAT, regardless of the sales amount.  | 402  |
| Vietnam       | ✓      | Enacted   | May 3, 2022            | Effective January 1, 2022, Vietnam requires non-resident vendors of digital services to customers (B2C and B2B) in Vietnam to register for and collect VAT, regardless of the sales amount.   | 403  |
|               |        |           |                        | On April 28, 2022, the Vietnamese General Directorate of Taxation (GDT) published a letter on its website requesting that foreign providers promptly complete all procedures and fulfil obligations as prescribed by law, if they have not done so already.   |      |
|               |        |           |                        | On November 21, 2022, Vietnam published a list of foreign providers registered for tax in Vietnam. As of date of publication of the list, 39 companies are registered for tax purposes.   |      |

# Taxation of the digitalized economy – indirect taxes

✓ *Enacted*
● *Proposed / Announced*
✗ *Proposal rejected*

| Country  | Status    | Latest development | Brief description   | Cite |
|----------|-----------|--------------------|---|------|
|          | ✓ Enacted | December 5, 2024   | The National Assembly of Vietnam recently adopted amendments to the Law on Tax Administration, which modifies tax registration, declaration, and payment obligations for e-commerce and digital platform-based businesses. This amendment extends the requirement to register for tax, declare, and make payments to include foreign suppliers with a permanent establishment in Vietnam, previously only applicable to those without such an establishment. The aim is to expand the tax base and prevent tax losses. Additionally, the law mandates that organizations that are operators of foreign digital platforms deduct and pay taxes on behalf of the foreign suppliers. Finally, organizations, whether domestic or foreign, managing e-commerce platforms are responsible for withholding, declaring, and paying taxes on behalf of business households and individuals operating through these platforms, unless they are ineligible for this arrangement. While the law becomes effective on January 1, 2025, the specific changes concerning e-commerce activities will start on April 1, 2025. | 404  |
|          | ✓ Enacted | January 21, 2025   | On December 31, 2024, Vietnam's General Department of Taxation issued Letter No. 6369/TCT-DNL, directing 100 banks and intermediary payment service providers to inform their branches about the obligation to withhold and remit taxes for transactions involving certain foreign e-commerce suppliers who have not complied with registration, declaration, and tax payment requirements in Vietnam.  | 405  |
| Zambia   | ✓ Enacted | March 21, 2024     | Effective April 1, 2024, Zambia requires non-resident vendors of digital services (including online platforms) to customers (B2C and B2B) in Zambia to register for and collect VAT, regardless of the sales amount.  | 406  |
|          | ✓ Enacted | October 15, 2025   | On October 15, 2025, the Zambia Revenue Authority announced the implementation of a 10 percent excise tax on gaming and betting, applicable to amounts staked by players. The duty is payable by betting and gaming companies beginning with transactions from September 2025. Companies are required to manually compute and remit the excise duty using their Withholding Tax accounts, selecting "Lumpsum Payment" as the payment type. Payments are due by the 15th of the month following the transaction period.  | 407  |
| Zimbabwe | ✓ Enacted | January 20, 2020   | Effective January 1, 2020, Zimbabwe requires non-resident vendors of digital services to customers (B2C and B2B) in Zimbabwe to register for and collect VAT if their sales exceed ZWD 1 million.   | 408  |

---

### Citations – Indirect taxes

- 1 KPMG International member firm in Albania
- 2 KPMG International member firm in Albania
- 3 KPMG Tax News Flash, “Albania: Tax authorities enforcing nonresident VAT digital services rules” (May 15, 2025)
- 4 Orbitax, Andorra Publishes Law Regulating Digital Assets and Blockchain Technology Including Tax Treatment (August 17, 2022)
- 5 KPMG International member firm in Angola
- 6 KPMG Tax News Flash, “Angola: Revisions to VAT law, including taxation of e-commerce transactions” (March 6, 2024)
- 7 CCH, Global VAT News & Features, Antigua And Barbuda Announces 2021 Budget (February 1, 2021)

# Taxation of the digitalized economy – indirect taxes

- 8 Argentina - General resolution on VAT amendments for digital services published – details on payment of tax (May 28, 2018), News IBFD; Orbitax, The Tax Hub, “Argentina Publishes Updated List of Digital Service Providers Subject to VAT Withholding”
- 9 Argentina - Reporting on and payment of Buenos Aires Province turnover tax on digital services – regulated (03 Dec. 2019), News IBFD
- 10 CCH, Global VAT News & Features, Argentina To Tax Cryptocurrency Transactions (Nov. 22, 2021).
- 11 Argentina - Tax Authorities Update Special VAT Withholding Regime for Digital Platforms (Jan. 30, 2023), News IBFD.
- 12 Tax Notes, Armenian Parliament Approve Draft Law on Digital Services VAT, (Nov. 18, 2021).
- 13 Aruba - 2023 Tax Plan: Proposal Presented to Parliament (Dec. 10, 2022), News IBFD.
- 14 Australia - Cross-border GST changes legislated (May 13, 2016), News IBFD
- 15 Australia - GST ruling on supplies connected with Australia finalized (12 Dec. 2019), News IBFD
- 16 KPMG Tax News Flash, "Australia: GST collection by offshore providers of hotel room sales" (October 31, 2019)
- 17 Australia - Imposition of GST on low-value goods importation delayed (June 19, 2017), News IBFD
- 18 KPMG Tax News Flash, “Australia: Tax treatment of digital assets and transactions; policy framework review” (March 22, 2022); KPMG Tax News Flash, “Australia: Board of Taxation releases consultation guide on digital asset tax treatment” (August 19, 2022)
- 19 KPMG Tax News Flash, “Australia: Draft update to GST treatment of cross-border supplies, digital currency” (August 10, 2022)
- 20 KPMG Tax News Flash, “Australia: Proposal to introduce tax on short-term accommodations (Victoria)” (August 28, 2024)
- 21 KPMG International member firm in Austria
- 22 KPMG International member firm in Austria
- 23 Austria; European Union - Draft bill on digital tax package gazetted (Oct 25, 2019), News IBFD
- 24 Azerbaijan State Tax Service (April 16, 2021)
- 25 KPMG International member firm in Azerbaijan
- 26 KPMG International member firm in Azerbaijan
- 27 KPMG International member firm in the Bahamas
- 28 Orbitax, The Tax Hub, “Bahamas Budget Communication 2019/20 Presented”
- 29 The Bahamas, 2020 Amending Bill and final Amendment Act
- 30 Orbitax, The Tax Hub, The Bahamas Issues Release on Enforcement of VAT on Digital Services Provided by Foreign Entities (October 30, 2020).
- 31 Bahrain - VAT introduced (Dec. 24, 2018), News IBFD
- 32 KPMG Tax News Flash, “Bahrain: Amended VAT place-of-supply rules for telecommunication services” (January 5, 2021)
- 33 Bangladesh - Budget 2019/20 – indirect taxation (June 14, 2019), News IBFD; Orbitax, The Tax Hub, Bangladesh Budget for 2019-2020 Delivered; KPMG International member firm in Bangladesh
- 34 KPMG International member firm in Bangladesh
- 35 KPMG International member firm in Barbados

# Taxation of the digitalized economy – indirect taxes

- 37 KPMG International member firm in Belarus
- 38 Belarus - Belarus Adopts Changes to VAT Rules for Distance Selling (Jan. 11, 2022) News IBFD.
- 39 Iurie Lungu, Belarus Summarizes New VAT Provisions, Tax Analysts (Jan. 23, 2023).
- 40 KPMG International member firm in Belgium
- 41 KPMG International member firm in Belgium
- 42 KPMG International member firm in Belgium
- 43 KPMG Tax News Flash, "Belgium: Guidance on taxation of cryptocurrency and NFTs; corporate income tax measures in tax reform proposals" (August 5, 2022)
- 44 KPMG Tax News Flash, "Belgium: Joint VAT liability for electronic interfaces" (November 27, 2023)
- 45 Benin - Tax Administration Implements Value Added Tax on Digital Services (May 4, 2023), News IBFD
- 46 Bhutan - Bhutan Enacts Goods and Services Tax Act 2020 (July 6, 2020), News IBFD; Ministry of Finance of Bhutan, Notification MoF/PPD/GST/Notification/2022/76 (July 14, 2022)
- 47 KPMG Tax News Flash, "Bhutan: New GST regime to replace existing sales tax framework" (October 07, 2025)
- 48 Orbitax, The Tax Hub, Update - Bolivia Publishes Draft Bill for VAT on Digital Services (May 7, 2021)
- 49 Tax authority of Bosnia and Herzegovina, Notice to foreign providers for services provided in B&H electronically
- 50 Bosnia and Herzegovina - Bosnia and Herzegovina Adopts Changes to VAT Implementing Regulation (May 7, 2025), News IBFD
- 51 Bosnia and Herzegovina – Notice to multinational companies without a registered office in Bosnia and Herzegovina that provide electronically delivered services to individuals in the territory of Bosnia and Herzegovina, Indirect Taxation Authority of BiH
- 52 Botswana - Botswana Proposes to Introduce VAT on Digital Services Supplied by Non-Residents (September 18, 2025), News IBFD
- 53 Brazil - Changes to tax on services – published (Jan. 2, 2017), News IBFD
- 54 Brazil - State VAT (ICMS) on digital goods (Oct. 19, 2017), News IBFD
- 55 Orbitax, Brazilian Federal Supreme Court Ministers Find Downloaded Software May Not be Subject to State Value Added Tax (ICMS); Brazil - Supreme Court Concludes State VAT Cannot be Levied on Software Licensing (February 25, 2021), News IBFD.
- 56 KPMG International member firm in Brazil.
- 57 KPMG Tax News Flash, "KPMG report: Impact of Brazil's indirect tax reform proposal on nonresidents" (May 14, 2024)
- 58 KPMG International member firm in Bulgaria
- 59 KPMG International member firm in Bulgaria
- 60 Cape Verde, State Budget Law, 2022
- 61 Orbitax, The Tax Hub, Cambodia Introduces VAT Registration Requirements for Non-Resident E-Commerce Providers; KPMG Tax News Flash, "Cambodia: VAT and e-commerce" (September 24, 2021); KPMG International member firm in Cambodia
- 62 KPMG Tax News Flash, "Cambodia: Reminder to register for e-commerce license, permit" (July 8, 2021)
- 63 KPMG Tax News Flash, "Cambodia: Amendment on implementation of VAT on e-commerce" (February 20, 2023)
- 64 Orbitax, The Tax Hub, Cameroon Finance Law for 2020 Published Including New Transfer Pricing Rules, VAT Requirements for E-Commerce, and Other Tax Measures



# Taxation of the digitalized economy – indirect taxes

- 65 Orbitax, Canada Provides Guidance on Pending Rules for Non-Resident Digital Economy Businesses (June 29, 2021); KPMG International member firm in Canada.
- 66 KPMG Tax News Flash, "Businesses Outside Quebec — New QST Rules in 2019" (December 7, 2018) ; KPMG International member firm in Canada.
- 67 KPMG Tax News Flash, "Businesses — Are You Meeting Saskatchewan PST Rules?" (February 15, 2019); KPMG Tax News Flash, "Canada: Proposed provincial sales tax rules in Saskatchewan for e-commerce platforms" (July 9, 2020)
- 68 KPMG Tax News Flash, " Canada: Tax measures enacted in British Columbia" (August 27, 2020); KPMG Tax News Flash, "Canada: Provincial sales tax, carbon tax measures (British Columbia)" (March 3, 2021); KPMG Tax News Flash, "Canada: Tax measures in 2022 budget enacted (British Columbia)", June 9, 2022
- 69 KPMG Tax News Flash, "Canada: Tax measures in 2021-2022 budget (Manitoba)" (April 8, 2021); Manitoba Finance, Information Bulletin No. 64 – The Retail Sales tax Act: Streaming Services and Online Platforms (Dec. 2021).
- 70 KPMG Tax News Flash, "Canada: Tax provisions in 2022 budget (Alberta)" (February 23, 2022); <https://www.alberta.ca/tourism-levy.aspx>
- 71 KPMG Tax News Flash, "Canada: Tax measures in 2023 budget (British Columbia)" (March 1, 2023)
- 72 Canada - Supreme Court of British Columbia Says Cloud Computing Products Are Not Subject to Sales Tax (March 16, 2023), News IBFD
- 73 KPMG Tax News Flash, "Canada: Sales tax changes target digital products and services (British Columbia)" (May 10, 2024)
- 74 Canada - Manitoba Budget 2025-26: No Personal or Corporate Income Tax Rate Changes; Changes to Tax Credits Announced (March 26, 2025), News IBFD
- 75 Canada - British Columbia Clarifies Software Is Taxable Based on Mobile Device Location for Provincial Sales Tax (June 25, 2025), News IBFD
- 76 Chad Budget 2025 In Depth: Chad to Introduce VAT on Electronic Platform Operators, (February 7, 2025) IBFD News
- 77 Ventas y Servicios – Nuevo Texto – Ley Sobre Impuesto a Las – Art.2, N.2, Art.8 – Ley Sobre Impuesto a La Renta, Art. 20, N.4, Art. 42, n.2 – Circular n.21 de 1991. (ORD. n. 1401, De 22.07.2020)
- 78 KPMG International member firm in Chile
- 79 KPMG International member firm in Chile
- 80 Chile - VAT Applies to Acquisition of Software from Non-Resident Providers (April 7, 2021), News IBFD
- 81 Chile - VAT Does Not Apply to Provision of Software Development Services by Non-Residents (May 11, 2021), News IBFD
- 82 KPMG International member firm in Chile
- 83 KPMG Tax News Flash, "Chile: Proposed changes to VAT law, other VAT developments" (January 13, 2022))
- 84 CCH, Global VAT News & Features, Chile To Target Foreign Firms On Digital VAT Compliance, (Jul. 7, 2021); Servicio Impuestos Internos, List of Non-Registered Nonresident Companies (Nov. 24, 2021); KPMG International member firm in the US
- 85 Chile - Tax Authorities Clarify Application of VAT on Financial Services Rendered by Non-Resident Company through Application Software (August 19, 2022), News IBFD.
- 86 SII, ORD. N° 3017 DE 12.10.2022
- 87 SII, ORD. N° 1290, DE 27.04.2023
- 88 KPMG Tax News Flash, "Chile: Tax compliance bill approved by Congress includes income tax, VAT, and transfer pricing measures" (September 30, 2024)
- 89 KPMG Tax News Flash, "Chile: Guidance on new VAT marketplace rules and low-value goods" (May 9, 2025)
- 90 Chile - Chile Sets VAT Registration Rules for Non-Resident E-Commerce and Platform Operators (July 16, 2025), News IBFD; Chile - Chile Issues VAT Filing and Payment Rules for Non-Resident Remote Sellers and Digital Platform Operators (August 8, 2025), News IBFD; Chile - Chile Modifies Digital Platform Operators' Rules to Verify Users' Tax Registration (August 12, 2025), News IBFD; Chile - Chile Establishes Rules to Validate VAT Exemption for Imported Low-Value Goods Purchased from Remote Sellers or

# Taxation of the digitalized economy – indirect taxes

- Digital Platform Intermediaries (August 28, 2025), News IBFD; Chile - Tax Administration Clarifies Upcoming VAT Rules for Remote Purchases of Low-Value Goods Through Digital Platform Intermediaries (September 9, 2025), News IBFD
- 91 Chile - Foreign Companies That Supply Digital Services to Non-VAT Taxpayers in Chile Are Required to Register Under Simplified VAT Regime, Tax Administration Rules (September 9, 2025), News IBFD
- 92 Chile - Tax Administration Clarifies Non-Resident Income Tax and VAT Treatment for Offshore Software Licensing Services (October 24, 2025), News IBFD
- 93 Chile - Chile Amends Rules to Validate VAT Exemption for Imported Low-Value Goods for Domestic Digital Platform Operators (October 29, 2025), News IBFD; Tax Administration Eliminates Exclusion of Goods Subject to Special Taxes from Simplified VAT Regime Applicable to Remote Sellers (October 29, 2025), News IBFD; Tax Administration Establishes New VAT Filing and Payment Rules for Domestic Digital Platform Operators (October 29, 2025), News IBFD
- 94 KPMG International member firm in China
- 95 Colombia - Practical details for complying with VAT obligations by foreign service providers – DIAN newsletter issued (Nov. 28, 2018), News IBFD
- 96 Colombia - VAT withholding on digital services provided from abroad – administrative regulation issued (Aug. 28, 2019), News IBFD
- 97 Orbitax, Colombia Ruling Provides that Concerts through Digital Platforms do Not Qualify for VAT Exemption for Public Performances
- 98 Colombia - Tax Authority Clarifies Tax Treatment of Crypto Assets (November 7, 2023), News IBFD
- 99 Colombia - Colombian Government Announces New Taxes to Finance State of Internal Unrest (January 30, 2025), News IBFD
- 100 Colombia - Colombian Constitutional Court Validates Tax Measures Introduced Under State of Internal Unrest (October 31, 2025), News IBFD
- 101 KPMG Tax News Flash, “Republic of the Congo: VAT on cross-border provision of digital services” (February 27, 2023)
- 102 Costa Rica - Law strengthening public finances gazetted (06 Dec. 2018), News IBFD; KPMG Tax News Flash, “Costa Rica: VAT on cross-border digital services” (June 15, 2020); KPMG Tax News Flash, “Costa Rica: VAT on cross-border digital services; credit, debit card issuers” (August 4, 2020), KPMG Tax News Flash, “Costa Rica: Update on VAT and cross-border digital services” (September 29, 2020)
- 103 Orbitax, The Tax Hub, Costa Rica Expands List of Digital Service Providers Subject to VAT and Amends Related Reporting Requirements
- 104 Costa Rica - Costa Rica Approves Procedure for Obtaining VAT Refund on Cross-Border Digital Services (July 22, 2021), News IBFD
- 105 Orbitax, Costa Rica Updates List of Digital Service Companies Subject to VAT Withholding (July 27, 2021); CCH, Global VAT News & Features, Costa Rica To Extend VAT To Accommodation Platforms (Oct. 27, 2022)
- 106 Costa Rica - Legislative Assembly Reviews Draft Bill Proposals on Crypto Assets (15 Nov. 2022), News IBFD
- 107 Costa Rica - Tax Administration Updates List of Cross-Border Digital Service Providers and Intermediaries (June 6, 2023), News IBFD
- 108 <https://www.hacienda.go.cr/docs/ListaProveedoresServiciosDigitalesTransfronterizos.pdf>
- 109 KPMG International member firm in Croatia
- 110 KPMG International member firm in Croatia
- 111 KPMG International member firm in Cyprus
- 112 KPMG International member firm in Cyprus
- 113 KPMG International member firm in Czechia
- 114 KPMG International member firm in Czechia
- 115 KPMG International member firm in Denmark

# Taxation of the digitalized economy – indirect taxes

- 116 KPMG International member firm in Denmark
- 117 CCH, Global VAT News & Features, Danish Tax Agency Says Digital Art NFTs Liable To VAT (Dec. 13, 2022).
- 118 Michael Smith, Virtual Gambling Coins Are Subject to VAT, Danish Council Says, Tax Analysts (March 6, 2023)
- 119 Skattestyrelsen, Moms og kunstnerisk virksomhed - "kryptokunst," available at [Moms og kunstnerisk virksomhed - "kryptokunst" - Skat.dk](#).
- 120 KPMG Tax News Flash, "Denmark: Expanded use of payment information in tax audits" (August 16, 2024)
- 121 Denmark - Danish Court Rules Amateur Gamer's Skin Sales Not Subject to VAT Due to Lack of Profit Motive, VAT Update
- 122 Denmark - Denmark Tax Agency Clarifies VAT Obligations for Non-EU-Based Company Developing Marketing Platform, Bloomberg Tax
- 123 Dominican Republic - Dominican Republic Provides Clarity on VAT on Transactions of Intangible Digital Assets (August 2, 2021), News IBFD; Dominican Republic - Dominican Republic Exempts Online Sale of E-Books for VAT Purposes, (October 27, 2021) News IBFD
- 124 KPMG Tax News Flash, "Dominican Republic: Proposal to impose VAT on digital services provided from abroad" (March 4, 2022); Orbitax, Dominican Republic General State Budget 2023 (October 18, 2022).
- 125 KPMG Tax News Flash, "Ecuador: Digital services subject to VAT (August 17, 2020); Orbitax, The Tax Hub, Ecuador Issues Rules for Withholding VAT on Digital Services; Orbitax, The Tax Hub, Ecuador Issues Rules on VAT Registration for Non-Resident Digital Service Providers and Orbitax, Ecuador Publishes Resolution on New Rules for VAT Withholding.
- 126 Ecuador - Ecuador Adopts Rules on Income Tax and VAT for Payment Aggregators and Online Marketplaces (June 8, 2021), News IBFD.
- 127 Ecuador - Ecuador Amends Requirement to Qualify as Payment Aggregator or Online Marketplace (Aug. 4, 2022), News IBFD.
- 128 Ecuador - Government Proposes Tax Incentives to Attract Investment in Audio-visual, Energy Sectors (Nov. 29, 2022), News IBFD.
- 129 Ecuador - Tax Authority Explains When Financial Institutions Must Issue Withholding Tax Receipts for Payments Made to Payment Aggregators and Online Marketplaces (Jan. 20, 2023), News IBFD.
- 130 [https://www.sri.gob.ec/o/sri-portlet-biblioteca-alfresco-internet/descargar/a07929dc-bc66-46f3-9a59-69c4eae9e98e/Catastro de Prestadores de Servicios Digitales No Residentes.pdf](https://www.sri.gob.ec/o/sri-portlet-biblioteca-alfresco-internet/descargar/a07929dc-bc66-46f3-9a59-69c4eae9e98e/Catastro%20de%20Prestadores%20de%20Servicios%20Digitales%20No%20Residentes.pdf)
- 131 Egypt - Egypt Introduces New Tax Requirements for Online Content Creators (Sep. 29, 2021), News IBFD.
- 132 KPMG International member firm in Egypt.
- 133 Orbitax, Egypt - Egyptian Tax Authority Issues Guidelines for Non-Resident Digital and Remote Services (March 28, 2023), News IBFD
- 134 KPMG International member firm in Estonia..
- 135 KPMG International member firm in Estonia.
- 136 KPMG Tax News Flash, "Ethiopia: New VAT rules for nonresident digital services providers" (October 2, 2024)
- 137 KPMG Tax News Flash, "Ethiopia: Further guidance on application of new VAT rules for nonresident digital services providers" (July 11, 2025)
- 138 Council Directive 2002/38/EC of 7 May 2002 amending and amending temporarily Directive 77/388/EEC as regards the value added tax arrangements applicable to radio and television broadcasting services and certain electronically supplied services.
- 139 EU Commission, Guide to the VAT mini One Stop Shop (MOSS).
- 140 EU Commission, Modernising VAT for cross-border e-commerce.
- 141 EU Commission, Modernising VAT for cross-border e-commerce; European Union - COVID-19 Pandemic: The Postponement Of the Entry Into Force of VAT E-Commerce Package Published in the Official Journal (July 29, 2020) News IBFD; European Union - Commission Implementing Regulation on detailed technical rules on information

# Taxation of the digitalized economy – indirect taxes

- collected under new VAT e-commerce rules – published (February 13, 2020), News IBFD European Union - European Commission Provides Detailed Guidance Regarding the New VAT E-Commerce Rules (October 1, 2020), News IBFD.
- 142 European Union - Commission Implementing Regulation on expanding web portal on VAT rates in connection with e-commerce package – published (January 17, 2020), News IBFD.
- 143 EU Council Directive amending Directive 2006/112/EC as regards introducing certain requirements for payment service providers; KPMG Tax News Flash, EU: Implementing regulation on VAT and e-commerce transactions; guidance for payment service providers, (April 6, 2022); European Union - EU Implementing Regulation for Payment Service Providers to Transmit Information on Cross-Border Payments Comes into Force (September 12, 2022), News IBFD.
- 144 European Union - VAT Expert Group Discussed Report on the VAT treatment of the Platform Economy in its 30th VAT Meeting (Nov. 30, 2021), News IBFD.
- 145 CCH, Global VAT News & Features, EU Ministers Clear The Way For Major VAT Rate Reforms,(Apr. 6, 2022).
- 146 European Union - European Commission VAT Committee Discusses VAT Treatment of Crypto-Assets, E-Wallets And Other Issues, in 120th Meeting, News IBFD.
- 147 European Union - 31st VAT Expert Group Meeting: Single VAT Registration, E-Invoicing, the Platform Economy and Fixed Establishments, News IBFD June 16, 2022
- 148 European Union; United Kingdom - ECJ Advocate General Opines on Validity of EU Provisions in Context of Services and Electronic Platforms: Fenix International (Case C-695/20) (VAT) (September 15, 2022), News IBFD
- 149 KPMG Tax News Flash, "EU: VAT Committee working paper on treatment of NFTs" (March 23, 2023)
- 150 European Union - European Parliament Members Suggest More Than 300 Amendments to VAT in the Digital Age (ViDA) Proposals (July 6, 2023), News IBFD
- 151 European Commission, WP 1070 - DANISH QUESTION ON SALES OF SKINS IN THE SECONDARY MARKET (November 21, 2023)
- 152 KPMG Tax News Flash, "EU: Working paper on VAT treatment of "crypto art" (April 29, 2024)
- 153 Lithuania; European Union - ECJ Preliminary Ruling Request (VAT): Žaidimų valiuta (Case C-472/24) – Mokestinių ginčų komisija prie Lietuvos Respublikos vyriausybės Submits Referral on VAT Treatment of Sale of 'Gold' from Computer Game 'Runescape' (September 2, 2024), News IBFD
- 154 KPMG Tax News Flash, "EU: Adoption of VAT in the digital age (ViDA) package" (March 11, 2025)
- 155 European Union – EU Adopts New Rules on Import VAT Collections, Reporting, Bloomberg Tax
- 156 KPMG Tax News Flash, "EU: Sale of in-game gold are taxable digital services (CJEU Advocate General opinion) " (September 12, 2025)
- 157 KPMG Tax News Flash, European Union: CJEU Confirms Electronic Marketplaces Qualify as Undisclosed Agents Pre-2015 Amendments" (October 9, 2025)
- 158 Fiji Revenue and Customs Service, <https://www.frcs.org.fj/our-services/taxation/taxation-laws-and-regulations/>
- 159 KPMG International member firm in Finland
- 160 Finland - Tax authorities issue updated guidance on VAT treatment of books, newspapers and magazines (July 1, 2019), News IBFD
- 161 KPMG International member firm in Finland
- 162 KPMG International member firm in Finland
- 163 KPMG Tax News Flash, "France: Tax compliance, reporting obligations of online platforms " (January 15, 2020); France - Reporting obligations for online platform operators – guidelines published (08 Jan. 2020), News IBFD
- 164 France – VAT treatment of ICOs and ITSs – ruling published (August 13, 2019), News IBFD
- 165 KPMG Tax News Flash, "France: Revised approach to determining permanent establishment; income tax and VAT consequences" (December 21, 2020)
- 166 KPMG International member firm in France

# Taxation of the digitalized economy – indirect taxes

- 167 KPMG International member firm in France
- 168 KPMG Tax News Flash, "France: Tax authority guidance on VAT treatment of non-fungible tokens" (February 16, 2024)
- 169 CCH, France Announces E-Commerce Action Plan (May 8, 2025)
- 170 KPMG International member firm in France
- 171 Official Journal of the Gabonese Republic, No. 126, August 11, 2021
- 172 KPMG International member firm in Georgia; Orbitax, Georgia Delays VAT Requirements for Non-Resident Digital Service Suppliers (August 5, 2021)
- 173 KPMG International member firm in Germany
- 174 Germany - Lower house of parliament adopts draft bill to avoid VAT losses in connection with supply of goods via online trading and to amend further tax provisions (Nov. 13, 2018), News IBFD; KPMG Tax News Flash, "Germany: Digital VAT package and distance sales proposals; other VAT developments" (September 29, 2020); KPMG International member firm in Germany
- 175 KPMG International member firm in Germany
- 176 KPMG International member firm in Germany
- 177 KPMG International member firm in Germany
- 178 KPMG Tax News Flash, "Germany: Draft bill for Annual Tax Act 2024 includes Pillar Two changes, other tax developments" (April 25, 2024)
- 179 KPMG Tax News Flash, "Germany: Transactions within VAT groups may be VAT-exempt; other VAT developments" (June 5, 2024)
- 180 Germany – Lower Tax Court of Niedersachsen, Judgment of July 10, 2025, Case No. 5 K 26/24, Wolters Kluwer
- 181 Bloomberg Tax, Germany – Germany MOF Clarifies VAT Treatment of Supplies of Online Livestreamed, On-Demand Events (August 18, 2025)
- 182 KPMG International member firm in Ghana; Ghana - Tax Bills Assented into Law (October 24, 2022), News IBFD.
- 183 KPMG International member firm in Germany
- 184 KPMG International member firm in Germany
- 185 Orbitax, Greece Extends 6% Reduced VAT Rate to Electronic Books and Publications (July 26, 2021)
- 186 Greece - Transactions Involving Cryptocurrencies Not Exempt from VAT, Says Complaints Settlement Directorate (November 30, 2023), News IBFD
- 187 Greece - Ministry of Finance Proposes to Abolish Stamp Duty, Introduce Digital Transaction Fee (September 6, 2024), News IBFD
- 188 Guatemala - Tax Authority Takes Initial Steps in Implementing Digital Economy Compliance System (October 19, 2021) News, IBFD
- 189 La Prensa, "SAR estudia posibilidad de imponer impuestos a plataformas digitales" (October 20, 2020)
- 190 KPMG International member firm in Hungary
- 191 KPMG International member firm in Hungary
- 192 KPMG International member firm in Iceland; Iceland - Threshold increased for VAT registration and invoice issuance (Jan. 10, 2017), News IBFD
- 193 India - Online content downloads and purchases from offshore service providers to be subject to service tax (Nov. 21, 2016), News IBFD
- 194 KPMG Tax News Flash, "India - GST notification update- rate of tax collection at source has been notified" (September 21, 2018)
- 195 CCH, Global VAT News & Features, Indian GST Council Agrees Rate, Policy Decisions (September 21, 2021)

# Taxation of the digitalized economy – indirect taxes

- 196 KPMG Tax News Flash, “India: Tax measures in budget 2023-2024, including GST-related measures” (February 2, 2023). KPMG International member firm in India.
- 197 KPMG International member firm in India.
- 198 KPMG Tax News Flash, “Amendment to CGST ACT and IGST Act for levy of GST on online money gaming” (August 22, 2023)
- 199 KPMG Tax News Flash, “Indonesia: Tax and customs relief measures (COVID-19)” (April 15, 2020); Orbitax, The Tax Hub, “Indonesia Introducing VAT on Digital Supplies from July 2020;” Orbitax, The Tax Hub, Indonesia Issues Regulation on VAT Collection for E-Commerce Transactions; Orbitax, The Tax Hub, Indonesia Appoints Third Batch of VAT Collectors for New Rules on Taxing Digital Goods and Services; Orbitax, The Tax Hub, Indonesia Appoints Fourth Batch of VAT Collectors for New Rules on Taxing Digital Goods and Services; Orbitax, Indonesia Appoints Fifth Batch of VAT Collectors for New Rules on Taxing Digital Goods and Services; Orbitax, The Tax Hub, Indonesia Appoints Additional VAT Collectors for New Rules on Taxing Digital Goods and Services; Directorate General of Taxation of Indonesia; VAT update, Indonesia - Tax Agency Announces Appointment of Phase 12 VAT Collection Entities for Digital Goods, Services; VAT update, Indonesia - Tax Agency Announces Appointment of Phase 13 VAT Collection Entities for Digital Goods, Services; Orbitax, Indonesia Appoints Additional VAT Collectors for Rules on Taxing Digital Goods and Services, January 10, 2022
- 200 Indonesia – Indoensia Updates Guidelines for VAT on Import of Digital Goods and Services, News IBFD May 10, 2022
- 201 CCH, Global VAT News & Features, IMF Guidance Released On BEPS Action 1 VAT Responses (May 26, 2021).
- 202 KPMG International member firm in Ireland
- 203 KPMG International member firm in Ireland
- 204 Irish Revenue, Revenue eBrief No. 095/22, April 27, 2022
- 205 Irish Revenue Publishes Updated Guidance on VAT Treatment of eGaming Services, Orbitax, May 23, 2022
- 206 Ireland - Revenue Clarifies VAT Place of Supply Rules for Virtual Events (June 30, 2025), News IBFD
- 207 Ireland - Social Media Influencers Are Subject to Standard Tax, VAT Rules, Revenue Clarifies (July 23, 2025), News IBFD
- 208 CCH, Global VAT News & Features, Israel Says, Like Cryptocurrencies, NFTs Are Property For Tax Purposes,(Mar. 18, 2022)
- 209 KPMG Tax News Flash, “Israel: Proposed VAT on digital services and goods” (March 23, 2023)
- 210 KPMG International member firm in Italy
- 211 KPMG International member firm in Italy
- 212 Italy - Tax Authorities Clarify VAT Treatment of Subscriptions to Online Databases, (January 14, 2022) News IBFD
- 213 Italy - Tax Authorities Clarify Place of Taxation of Supplies of Online Event Admission Services for VAT Purposes (October 3, 2022), News IBFD
- 214 Italy - Tax Authorities Clarify VAT Treatment of Online Games Activities (Jan. 9, 2023), News IBFD.
- 215 Italy - Tax Authorities: Issuance of Utility Token in Initial Coin Offer Falls Outside Scope of VAT (Jan. 12, 2023), News IBFD.
- 216 KPMG Tax News Flash, “Italy: 2023 budget law tax measures, including DAC7 and windfall profits tax on energy” (Jan. 25, 2023).
- 217 KPMG International member firm in Italy.
- 218 Orbitax, Ivory Coast Tax Annex to the Finance Law for 2022, Jan. 11, 2022.
- 219 KPMG International member firm in Ivory Coast.
- 220 Japan - NTA issues English-language guide on consumption tax on electronic services (Jul. 7, 2015), News IBFD.
- 221 Japan - National Tax Agency Releases FAQs on Platform Taxation (August 7, 2024), News IBFD
- 222 Jersey - Jersey Approves Budget Law for 2022 (Dec. 21, 2021), News IBFD ; Jersey - Proposed Mini Budget 2022 Includes Tax Relief for Lower Income Households (August 9, 2022), News IBFD; CCH, Global VAT News & Features, Jersey Enacts Finance Law To Implement Budget Tax Changes (Jan. 6, 2023).



# Taxation of the digitalized economy – indirect taxes

- 223 Tax Analysts, Kazakhstan's New VAT Rules for E-Commerce Sales and Digital Services (Feb. 22, 2021).
- 224 KPMG International member firm in Kazakhstan.
- 225 KPMG Tax News Flash, "Kazakhstan: Public consultation on proposed framework for "conditional VAT registration"" (August 22, 2025)
- 226 Kenya - Finance Act 2019 published (Nov. 18, 2019), News IBFD; Orbitax, The Tax Hub, Kenya Publishes Final Regulations for VAT on Supplies Through Digital Market Places; Kenya - Finance Act 2022: Indirect Taxation – Government Clarifies That VAT Registration Threshold Does Not Apply to Non-Resident Suppliers of Digital Services (July 15, 2022), News IBFD
- 227 Value Added Tax (Electronic, Internet and Digital Marketplace Supply) Regulations 2023 (March 21, 2023).
- 228 KPMG Tax News Flash, "Kenya: Excise duty on services provided by nonresidents through digital platforms" (January 29, 2025)
- 229 KPMG International member firm in Kenya (May 21, 2025)
- 230 Kenya - Finance Act 2025 in Depth: Government Expands List of Taxable Supplies (July 4, 2025), News IBFD
- 231 Orbitax, Kosovo Issues Notice on VAT Obligations for Foreign Providers of Digital Services; Kosovo - Kosovo Tax Administration Clarifies Definition and VAT Treatment of Digital Services Supplied by Non-Resident Companies (July 31, 2025), News IBFD
- 232 Kyrgyzstan Tax Code 2022; Orbitax, Kyrgyzstan Launches VAT Registration Service for Foreign Providers of Electronic Services (June 23, 2022)
- 233 KPMG Tax News Flash, "Laos: VAT on cross-border provision of digital services" (March 29, 2024)
- 234 KPMG International member firm in Latvia
- 235 KPMG International member firm in Latvia
- 236 KPMG International member firm in Switzerland
- 237 KPMG International member firm in Switzerland
- 238 KPMG International member firm in Lithuania
- 239 KPMG International member firm in Lithuania
- 240 Bloomberg Tax, Lithuania Tax Agency Issues FAQs on Tax Obligations for Influencer Activities (March 27, 2025)
- 241 KPMG International member firm in Luxembourg
- 242 KPMG International member firm in Luxembourg
- 243 Malaysia - Service tax on digital services – draft bill passed (Apr. 9, 2019), News IBFD; Malaysia – Service Tax (Amendment) Regulations 2019 gazetted (September 5, 2019), News IBFD; Malaysia – Service tax policy No.1/2019 – issued (September 10, 2019), News IBFD; Orbitax, The Tax Hub, "Malaysia Publishes Service Tax (Digital Services) Regulations 2019"; Orbitax, The Tax Hub, "Malaysia Publishes New Service Tax Guide on Digital Services; "Orbitax, Malaysia Updates Tax Guide on Digital Services; Orbitax, Malaysia Issues Amendment to Service Tax Policy on Exemption for Digital Services Related to Banking/Financial Services (August 23, 2021); KPMG International member firm in Malaysia
- 244 Orbitax, Malaysia Issues Amendment to Service Tax Policy on Exemption for Digital Services Related to Banking/Financial Services (August 23, 2021); KPMG Tax News Flash, "Malaysia: Guidance on service tax exemption for digital payment services by local non-bank providers" (August 1, 2022)
- 245 KPMG Tax News Flash, "Malaysia: Digital platforms subject to tourism tax, effective July 2021" (March 17, 2021); KPMG Tax News Flash, "Malaysia: Tourism tax postponed, digital platform service providers" (April 7, 2021); KPMG Tax News Flash, "Malaysia: FAQs on tourism tax and bookings via online platforms" (January 22, 2021); KPMG Tax News Flash, "Malaysia: Tourism tax postponed, digital platform service providers" (April 7, 2021); KPMG Tax News Flash, "Malaysia: Tourism tax on premises booked via digital platform service providers postponed to 2023" (October 6, 2021)

# Taxation of the digitalized economy – indirect taxes

- 246 KPMG Tax News Flash, "Malaysia: Proposed measures for sales tax on low-value goods include new requirements for online sellers" (August 2, 2022); Malaysia - Malaysia Approves Bill to Impose Sales Tax on Low Value Goods (August 26, 2022), News IBFD; KPMG Tax News Flash, "Malaysia: Sales tax on low value goods effective 1 January 2024" (November 6, 2023)
- 247 KPMG International member firm in Malta.
- 248 KPMG International member firm in Malta.
- 249 Mauritius - Mauritius Implements New VAT Regulations on Digital and Electronic Services to Increase Revenue and Enhance Fair Competition (September 3, 2025), News IBFD
- 250 KPMG Tax News Flash, "Mexico: Tax reform for 2020; focus on international taxation, digital taxation, other items" (December 19, 2019); KPMG Tax News Flash, "Mexico: Taxation of digital services, enactment expected for January 2021 effective date" (November 9, 2020); KPMG Tax News Flash, "Mexico: Tax provisions in miscellaneous resolution for 2020" (January 9, 2020), KPMG Tax News Flash, "Mexico: VAT on digital services provided by foreign residents without permanent establishment" (May 21, 2020) and Mexico - Miscellaneous Tax Resolution for 2020 – SAT Introduces Rules on VAT on Digital Intermediation Services (June 3, 2020), News IBFD
- 251 KPMG International member firm in Mexico and KPMG Tax News Flash "Mexico: Tax on digital platforms for distribution and delivery of goods and food (Mexico City)"
- 252 KPMG Tax News Flash, "Mexico: New requirements for registering foreign digital service providers" (July 16, 2024)
- 253 KPMG Tax News Flash, "Mexico: Rules for collecting tax on hosting services on digital platforms (Veracruz)" (October 9, 2024)
- 254 KPMG Tax News Flash, "Mexico: New obligations for crowdfunding platforms to withhold income tax and VAT" (October 24, 2024); KPMG Tax News Flash, "Mexico: Tax authority clarifies definition of digital intermediation services" (October 24, 2024); KPMG Tax News Flash, "Mexico: New VAT withholding requirement for platforms facilitating the sales of goods for nonresidents" (October 25, 2024).
- 255 KPMG Tax News Flash, "Mexico: 2026 Economic Package includes proposed indirect tax reforms" (September 12, 2025)
- 256 KPMG Tax News Flash, "Mexico: List of 268 registered foreign providers of digital services (as of August 31, 2025)" (September 16, 2025)
- 257 Tax Analysts, Moldovan Parliament Approves Electronic Services VAT Proposal (December 10, 2019); Orbitax, The Tax Hub, "Moldova Launches VAT Service for Non-Resident Suppliers of Digital Goods and Services;" Orbitax, The Tax Hub, Moldova Issues New Guidance on VAT for Non-Resident E-Commerce Providers; Orbitax, The Tax Hub, Moldova Confirms VAT Obligations of Non-Resident Digital Service Providers (November 30, 2020)
- 258 Moldova - Moldova Applies VAT Exemption of Electronic Books and Periodicals, News IBFD, April 29, 2022
- 259 KPMG International member firm in Serbia
- 260 KPMG Tax News Flash, Morocco: VAT on cross-border provision of digital services (March 4, 2024)
- 261 Morocco - Budget 2025 in Depth – Morocco Clarifies Nexus Criteria for Electronic Service Providers (December 31, 2024), News IBFD.
- 262 Nepal's Finance Bill for 2022; Nepal's Finance Bill for 2024
- 263 Nepal Tax Agency Explains Updated Procedure for VAT on Digital Services by Nonresident Taxpayers Bloomberg Law News (June 6, 2023)
- 264 Bloomberg Tax, Nepal Tax Agency Posts Updated Notice on VAT Procedures for Nonresidents' Domestic Electronic Service Supplies (August 15, 2025)
- 265 KPMG International member firm in the Netherlands
- 266 KPMG International member firm in the Netherlands
- 267 CCH, Global VAT News & Features, Netherlands To Waive Certain VAT E-Commerce Fines,(Oct. 24, 2023); Netherlands - Government Waives Administrative Fines on E-Commerce Defaults Through 1 January 2025 (July 29, 2024), News IBFD
- 268 Netherlands - Netherlands Seeks Public Input on New VAT Rules for Digital Platforms (October 6, 2025), News IBFD
- 269 KPMG International member firm in France



# Taxation of the digitalized economy – indirect taxes

- 270 New Zealand - Taxation (Residential Land Withholding Tax, GST on Online Services, and Student Loans) Bill receives Royal assent (May 18, 2016), News IBFD
- 271 New Zealand - Taxation (Annual Rates for 2019-20, GST Offshore Supplier Registration, and Remedial Matters) Bill receives Royal assent (June 28, 2019), News IBFD
- 272 KPMG Tax News Flash, "New Zealand: Interest limitations, GST measures and foreign exchange rules in pending bill" (March 7, 2022)
- 273 KPMG Tax News Flash, "New Zealand: GST measures and dual-resident company tax changes in pending bill" (August 31, 2022); KPMG Tax News Flash, "New Zealand: Update on bill including GST measures and dual-resident company tax changes" (March 7, 2023); KPMG International member firm in New Zealand
- 274 New Zealand, Taxation (Annual Rates for 2023-24, Multinational Tax, and Remedial Matters) Act 2024 (March 28, 2024)
- 275 KPMG Tax News Flash, "New Zealand: August tax bill includes implementation of cryptoasset reporting framework (CARF)" (August 30, 2024)
- 276 New Zealand - Inland Revenue Issues Exposure Drafts on When GST Listed Services Are Supplied Through Electronic Marketplaces and on Mixed Supplies (May 19, 2025), News IBFD
- 277 Niger - Budget 2025 In Depth: Government Introduces VAT on Goods and Services Supplied Via E-Commerce Platforms (January 24, 2025), News IBFD
- 278 KPMG Tax News Flash, "Nigeria: Tax provisions in Finance Act, 2020" (January 16, 2020) and KPMG Tax News Flash, "Nigeria: Foreign companies having "significant economic presence" for tax purposes" (June 1, 2020)
- 279 Orbitax, The Tax Hub, Nigeria Tax Changes for 2021 (April 13, 2021).
- 280 Guidelines on Simplified Compliance Regime for Value Added Tax (VAT) for Non-resident Suppliers, Federal Inland Revenue Service No.2021/19 (October 11, 2021); Nigerian Finance Act, 2021
- 281 KPMG Tax News Flash, "Nigeria: Direct collection of taxes from online gaming transactions" (October 31, 2022)
- 282 KPMG Tax News Flash, "Nigeria: Direct and indirect tax changes in Finance Act 2023" (June 6, 2023); KPMG International member firm in Nigeria
- 283 Nigeria - Federal High Court Affirms FIRS's Power to Collect VAT on Food and Transport Services Through Ride-Hailing Platforms (July 29, 2025), News IBFD
- 284 KPMG International member firm in North Macedonia.
- 285 KPMG International member firm in Norway.
- 286 Orbitax, The Tax Hub, "Norway's New VAT Rules on Supplies of Low-Value Imported Goods Coming into Force"
- 287 CCH, Global VAT News & Features, Norway Lists 2020 Tax Changes (Jan. 3, 2020)
- 288 CCH, Global VAT News & Features, Norway Clarifies VAT Rules For Digital Art Sales (Dec. 16, 2022).
- 289 CCH, Global VAT News & Features, Norway Clarifies VAT Rules For Digital Art Sales (Dec. 16, 2022); KPMG International member firm in Norway.
- 290 Tax Appeals Board Decision SKNS1-2023-30
- 291 Norway - Norway to Impose Local Visitor Tax on Short-Term Accommodation (April 11, 2025), News IBFD
- 292 KPMG Tax News Flash, "Oman: VAT regime, effective date of April 2021" (October 14, 2020)
- 293 Oman; GCC - Oman Clarifies VAT Treatment of E-commerce (Aug. 31, 2022), News IBFD
- 294 OECD, "International VAT/GST Guidelines" (April 12, 2017)
- 295 OECD, "Mechanisms for the Effective Collection of VAT/GST" (October 24, 2017); OECD, "The Role of Digital Platforms in the Collection of VAT/GST on Online Sales" (June 20, 2019)
- 296 KPMG Tax News Flash, "OECD: Digital platforms and VAT policy regarding sharing and gig economy" (April 19, 2021)

# Taxation of the digitalized economy – indirect taxes

- 297 Orbitax, OECD Publishes VAT Digital Toolkit for Latin America and the Caribbean (June 25, 2021) ; Orbitax, OECD Releases New VAT Digital Toolkit for Asia-Pacific, March 11, 2022; Orbitax, OECD Releases New Toolkit to Strengthen the Effective Collection of VAT on e-Commerce in Africa (February 16, 2023)
- 298 KPMG Tax News Flash, "Pakistan: Tax measures in Finance Bill 2021" (June 14, 2021); Orbitax Pakistan Publishes Finance Act 2021 (July 9, 2021) ; CCH, Global VAT News & Features, Pakistan To Introduce New WHT For Online Marketplaces, (Aug. 17, 2021); KPMG International member firm in Pakistan
- 299 KPMG International member firm in Pakistan
- 300 Palau Goods and Services Tax Act, 2021; Palau Goods and Services Tax Regulations
- 301 CCH, Global VAT News & Features, Panama Mulling VAT On Digital Services (August 16, 2023)
- 302 Paraguay - Tax reform law enacted – value added tax (Oct.1, 2019), News IBFD and Benitez Cudas & Asociados - KPMG Member Firm in Paraguay; Orbitax, The Tax Hub, Paraguay Implements Withholding on Digital Services
- 303 Paraguay Tax Agency Releases Binding Consultation Clarifying VAT on Digital Call Center Services for Nonresidents, Bloomberg Law News (August 25, 2023)
- 304 KPMG Tax News Flash, "Peru: VAT on cross-border provision of digital services" (August 26, 2024)
- 305 KPMG International member firm in Peru.
- 306 Peru - Tax Authority Launches Virtual Form and Platform for Tax on Remote Gaming and Excise Duty on Remote Gaming (February 3, 2025), News IBFD.
- 307 KPMG Tax News Flash, "Philippines: Tax treatment of payments to "social influencers" (October 19, 2021)
- 308 KPMG Tax News Flash, "Philippines: New law imposes VAT on cross-border provision of digital services" (October 3, 2024)
- 309 KPMG Tax News Flash, "Philippines: Application of VAT on digital services" (January 23, 2025)
- 310 Bloomberg Tax, Philippines Tax Agency Issues Regulation on Imposing VAT on Nonresident Digital Service Providers (April 30, 2025)
- 311 KPMG International member firm in the Philippines
- 312 Philippines – Philippines Eyeing 10pc Tax On Gambling Operators, CCH AnswerConnect
- 313 KPMG International member firm in Poland
- 314 KPMG International member firm in Poland
- 315 KPMG International member firm in Portugal
- 316 KPMG International member firm in Portugal
- 317 Puerto Rico Treasury Department, REGLAMENTO DEL CÓDIGO DE RENTAS INTERNAS DE 2011
- 318 KPMG International member firm in the United States.
- 319 KPMG International member firm in Romania
- 320 KPMG International member firm in Romania
- 321 Russia - E-services – new rules established from 1 January 2017 (August 11, 2016), News IBFD
- 322 Russia - Amendments to VAT treatment of digital cross-border supplies – law published (December 22, 2017), News IBFD; KPMG Tax News Flash, "Russia: Clarifications concerning VAT exemption for licenses of software and databases" (February 11, 2021)
- 323 KPMG Tax News Flash, "Russia: VAT exemption available for certain software and database providers" (August 4, 2020)
- 324 KPMG International member firm in Russia (November 12, 2020)

# Taxation of the digitalized economy – indirect taxes

- 326 Iurie Lungu, Russia Outlines Digital Mining Taxation, Corporate Tax Write-Offs (February 15, 2023)
- 327 Russia - Russian Ministry of Finance Proposes to Charge VAT on Purchases Through Online Platforms (October 7, 2025), News IBFD
- 328 Orbitax, Rwanda Considering VAT on Digital Services, March 18, 2022
- 329 Saudi Arabia - VAT Law gazetted (August 2, 2017), News IBFD
- 330 Saudi Arabia; GCC - Tax Authorities Clarify Online Store VAT Treatment (March 8, 2021), News IBFD; Saudi Arabia - Tax and Customs Authority Details VAT Application on E-Commerce (September 2, 2021), News IBFD
- 331 KPMG Tax News Flash, "Saudi Arabia: VAT amendments approved, effective immediately" (April 29, 2025).
- 332 KPMG Tax News Flash, " Senegal: Changes to VAT on cross-border provision of digital services, now effective from 1 July 2024" (June 6, 2024)
- 333 Serbia - Ministry of Finance explains registration of foreign entities for VAT purposes (May 31, 2016), News IBFD
- 334 Sierra Leone - Sierra Leone Introduces Digital Services Tax (January 14, 2021), News IBFD; Sierra Leone - Sierra Leone Enacts Finance Act 2023, Introduces Minimum Alternate Tax at 3% for Companies (May 19, 2023), News IBFD
- 335 KPMG Tax News Flash, "Singapore: GST changes in budget 2018" (April 19, 2018)
- 336 Republic of Singapore, Government Gazette n.48, December 31, 2019 - Goods and Services Tax Amendment Act 2019 (No. 33 of 2019)
- 337 Inland Revenue Authority of Singapore, Budget 2021 - Overview of Tax Changes; Orbitax, The Tax Hub, Singapore Publishes New Guidance on Imports of Low-Value Goods, Updated Guidance on Purchase of Remote Services, and Related Draft Guidance; CCH, Global VAT News & Features, Singapore To Widen GST Net to More Imported Goods, Services, (Jul. 13, 2021); Orbitax, Singapore Publishes New GST Guides on Taxing Imported Low-Value Goods and Remote Services Through Overseas Vendor Registration Regime (August, 2, 2021)
- 338 KPMG International member firm in Slovakia
- 339 KPMG International member firm in Slovakia
- 340 Slovak Republic - Tax Authorities Clarify Application of VAT to Transactions Involving Cryptocurrencies (May 31, 2023), News IBFD
- 341 KPMG International member firm in Slovenia
- 342 KPMG International member firm in Slovenia
- 343 South Africa - Final Electronic Services Regulations published (April 4, 2014), News IBFD; KPMG Tax News Flash, "South Africa: New VAT registration requirements, non-resident suppliers of e-services" (March 11, 2019); South Africa - SARS Provides Definition for Content and Telecommunication Services Under Electronic Services (August 19, 2020), News IBFD; KPMG International member firm in South Africa
- 344 South Africa - South Africa Publishes VAT Guidance for Foreign Suppliers of Electronic Services (Sep. 2, 2022), News IBFD; South Africa - South Africa Publishes Updated VAT Guide on Supply of Electronic Services (May 3, 2023), News IBFD
- 345 KPMG International member firm in South Africa
- 346 South Africa – National Treasury Invites Public Comments on Draft Taxation Laws Amendment Bill 2025 (August 19, 2025), News IBFD
- 347 Korea (Rep.) - 2015 Tax Amendments – VAT (August 11, 2015), News IBFD
- 348 Korea (Rep.) - Tax reform bill approved (December 20, 2018), News IBFD
- 349 KPMG International member firm in South Korea
- 350 KPMG International member firm in Spain

# Taxation of the digitalized economy – indirect taxes

- 352 Spain - Tax Authorities Classify NFT Sales as Electronically Supplied Services for VAT Purposes (May 31, 2022), News IBFD
- 353 KPMG Tax News Flash, "Sri Lanka: Value Added Tax (Amendment) Act No 04 of 2025 enacted" (April 21, 2025)
- 354 Sri Lanka - Sri Lanka Defers VAT on Non-Resident Digital Services Providers to April 2026 (September 8, 2025), News IBFD
- 355 Suriname - National Assembly Approves 10% VAT Law (Aug. 31, 2022), News IBFD
- 356 KPMG International member firm in Sweden
- 357 KPMG International member firm in Sweden
- 358 KPMG International member firm in Sweden
- 359 Skatteverket, Bank- och finansieringstjänster (June 1, 2023)
- 360 KPMG Tax News Flash, "Sweden: VAT treatment of NFTs associated with a digital work" (April 2, 2024)
- 361 KPMG International member firm in Switzerland; Switzerland - Federal Council brings partially revised VAT Act into force (June 6, 2017), News IBFD; Switzerland - Federal Tax Administration announces VAT registration rules for mail-order businesses (Nov. 21, 2018), News IBFD; Swiss Federal Tax Administration, News Section (June 23, 2020) and KPMG Tax News Flash, "Switzerland: Modified VAT definition with respect to electronically supplied services" (July 16, 2020)
- 362 Switzerland - Federal Council Approves VAT Reform (August 27, 2024), News IBFD
- 363 KPMG Tax News Flash, "Switzerland: Blockchain services partially taxable and partially non-taxable for VAT purposes" (November 6, 2023)
- 364 KPMG Tax News Flash, "Switzerland: Final VAT guidelines on platform rules for goods" (February 4 2025)
- 365 Taiwan - VAT registration threshold for foreign e-commerce enterprises announced (Mar. 22, 2017), News IBFD
- 366 KPMG Tax News Flash, "Taiwan: Invoice requirements for foreign e-commerce suppliers, effective January 2020" (October 29, 2019)
- 367 CCH,- Global VAT News & Features, Taiwan Seeks VAT From Trading Online Game 'Wealth' (August 18, 2023).
- 368 Bloomberg Tax, Taiwan MOF Announces Increase in VAT Registration Threshold for Foreign E-Commerce Operators Selling Services (April 10, 2025).
- 369 Orbitax, The Tax Hub, Tajikistan Introducing VAT Obligations for Foreign E-Service Providers (December 29, 2020)
- 370 KPMG International member firm in Tanzania; Orbitax, Tanzania Budget Speech for 2022/23 Delivered Including a New Digital Services Tax (June 17, 2022); Tanzania - Tanzania Issues Regulations on Registration of Non-Resident Suppliers of Electronic Services for VAT (August 4, 2022), News IBFD; KPMG Tax News Flash, "Tanzania: Tax measures in Finance Act, 2022 include VAT and excise tax changes" (July 12, 2023).
- 371 Tanzania Revenue Authority, Public Notice Online Return Filing and Payment for Non-Resident Electronic Service Providers (February 28, 2023)
- 372 KPMG Tax News Flash, "Tanzania: VAT and DST obligations for nonresident providers of cross-border electronic services" (January 31, 2024)
- 373 Tanzania - Tanzania MOF Presents 2025-2026 Budget Speech, Tanzania Parliament Considers 2025 Finance Bill, Bloomberg Tax
- 374 Thailand - Government Approves Draft VAT Bill on Foreign Digital Services (June 10, 2020), News IBFD; KPMG Tax News Flash, "Thailand: Guide regarding VAT and electronic services provided by non-residents" (July 13, 2021); KPMG International member firm in Thailand
- 375 Thailand - Thailand Gazettes VAT Exemption for Qualifying Digital Asset Transactions (May 25, 2022), News IBFD.
- 376 Thailand Providing VAT Exemption for Data Centre Businesses, Orbitax (July 7, 2022); KPMG Tax News Flash, "Thailand: VAT exemption granted to promote data centre businesses" (November 28, 2022)
- 377 KPMG International member firm in Thailand
- 378 Tax Notes, Thailand Reviewing VAT Exemption for Low-Value Chinese Imports, March 11, 2024

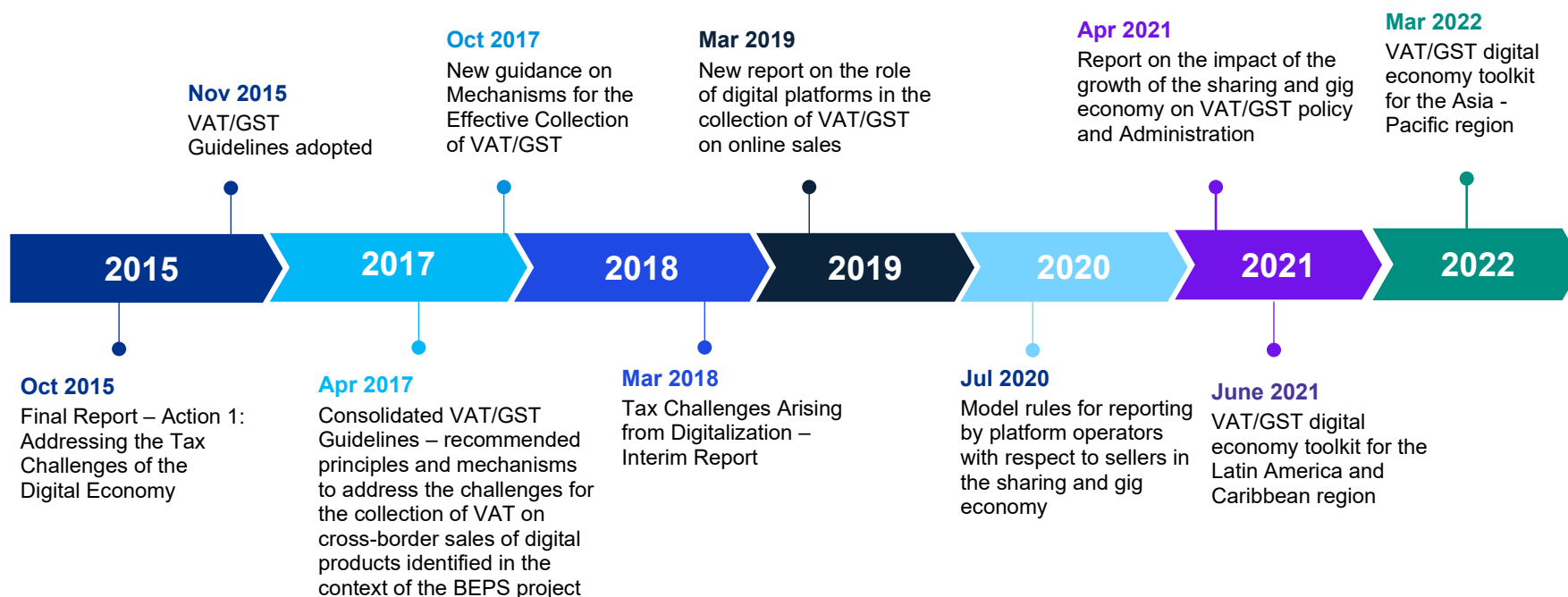
# Taxation of the digitalized economy – indirect taxes

- 379 Bloomberg Tax, Thailand Gazette's Royal Decree Exempting VAT for Cryptocurrency, Utilization Digital Token Transfers (September 27, 2024)
- 380 Türkiye - General Communiqué No. 17 on Value Added Tax Law gazetted (January 31, 2018), News IBFD
- 381 Türkiye - Government Clarifies VAT Exemption for Digital Content Creators, Abolishes Advance Refunds for Reduced-Rate Transactions (February 28, 2025), News IBFD
- 382 Uganda - VAT on electronic services supplied by non-residents – public notice issued (Oct. 24, 2019), News IBFD; Uganda - Tax Authority Reminds Non-Resident Suppliers of Digital Services to Register for VAT and File Returns (Jul. 8, 2022), News IBFD; CCH - Global VAT News & Features, Uganda Explains Main Tax Law Changes This Fiscal Year, (Jul. 14, 2021); URA, FAQs for Non-Resident Suppliers of Electronic Services (November 8, 2022)
- 383 KPMG Tax News Flash, "KPMG Uganda 2023/24 budget brief" (June 20, 2023)
- 384 KPMG Tax News Flash, "Ukraine: VAT on digital services supplied by non-residents" (June 7, 2021) ; Taxnotes, Ukraine Clarifies VAT Regime for Cross-Border Digital Services, (November 10, 2021); Orbitax, Ukraine Amends VAT Registration Regulations for Non-Resident Suppliers of Electronic Services, January 19, 2022; Iurie Lungu, Ukraine Clarifies VAT Registration Requirement, Tax Notes (September 30, 2022); Ukraine - Ukraine Clarifies VAT Obligations for Non-Residents Supplying Electronic Services (22 Nov. 2022), News IBFD
- 385 United Arab Emirates - VAT Executive Regulations – signed (Dec. 1, 2017), News IBFD; Orbitax, The Tax Hub, UAE Tax Authority Issues E-Commerce VAT Guide
- 386 KPMG Tax News Flash, "Amended VAT executive regulations include new e-commerce requirements" (November 18, 2022); United Arab Emirates; GCC - Federal Tax Administration Clarifies Criteria and Conditions for E-Commerce Supplies in UAE Declarations (February 28, 2023), News IBFD
- 387 KPMG Tax News Flash, "UAE: VAT exemption does not apply to cryptocurrency mining" (January 16, 2025)
- 388 KPMG International member firm in the United Kingdom
- 389 United Kingdom - Budget for 2016-17 – Fulfilment House Due Diligence Scheme: technical consultation concluded (Mar. 13, 2018), News IBFD
- 390 KPMG International member firm in the United Kingdom; Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union (January 24, 2020)
- 391 HMRC, Changes to VAT treatment of overseas goods sold to customers from 1 January 2021 (July 20, 2020); CCH, Global VAT News & Features, UK Updates Brexit VAT Guidance For Imported Goods,(October 14, 2020); Orbitax, The Tax Hub, UK Guidance on VAT Treatment of Overseas Goods Sold Through Online Marketplaces Following Brexit Transition Period
- 392 United Kingdom - Budget 2020 – presented (Mar. 11, 2020), News IBFD; CCH, Global VAT News & Features, HMRC Updates VAT Guidance On Digital Publications (March 25, 2021); CCH, Global VAT News & Features, HMRC Responds To Supreme Court Ruling On Digital Newspapers (June 9, 2023)
- 393 All Answers Ltd. v. HM Revenue & Customs, [2023] UKFTT 737 (TC) (August 23, 2023).
- 394 Bolt Services UK Ltd. V. HMRC, [2023] UKFTT 01043 (TC) (December 15, 2023)
- 395 Global Tax NEWS, CCH, UK Probing VAT Status Of Online Traders (January 26, 2024)
- 396 Tax Notes, Bolt UK Hails Victory in Ride-Sharing VAT Dispute (March 25, 2025)
- 397 Bloomberg Tax, UK Tax Office Seeks Input on Simplified Digital Gambling Regime (April 29, 2025)
- 398 KPMG Tax News Flash, "UK: Online marketplaces liable for VAT on goods sold by overseas businesses" (July 7, 2025)
- 399 KPMG member firm in the United States
- 400 Uruguay - Resolution on taxation of digital economy issued (July 27, 2018), News IBFD
- 401 Bloomberg Tax, Uruguay Tax Agency Posts Consultation Clarifying VAT Treatment of Digital Platform Without PE (October 10, 2025)
- 402 KPMG Tax News Flash, "Uzbekistan: VAT rules for e-services" (February 13, 2020)

- 403 KPMG Tax News Flash, “Vietnam: Taxation of e-commerce and digital-based transactions” (October 15, 2021); Orbitax, Vietnam Launches Electronic Portal for Foreign E-Commerce Suppliers, March 22, 2022; Orbitax, Vietnam Tax Authority Posts Letter to Foreign E-Commerce Providers, May 3, 2022
- 404 Vietnam - National Assembly Approves Amendments to Law on Tax Administration (December 5, 2024), News IBFD
- 405 Orbitax, Vietnam Tax Authority Instructs Banks to Deduct Tax on Payments to Certain Non-Registered Foreign E-Commerce Suppliers (January 21, 2025)
- 406 KPMG Tax News Flash, “Zambia: VAT on cross-border provision of digital services” (March 21, 2024)
- 407 Orbitax, Zambia Implements 10% Excise Duty on Gaming and Betting (October 23, 2025)
- 408 KPMG International member firm in Zimbabwe

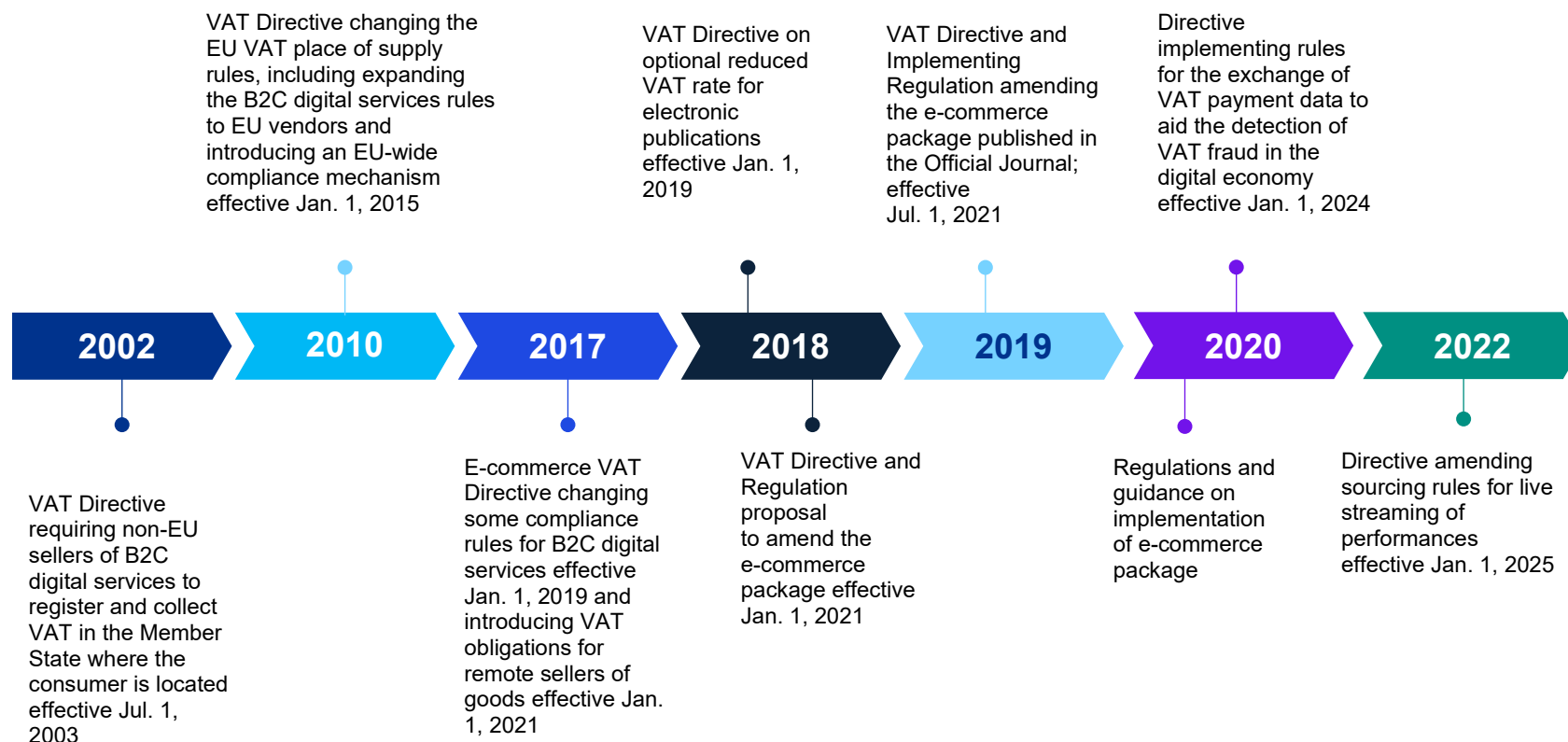
# Taxation of the digitalized economy – indirect taxes

## OECD Milestones – Indirect taxes



# Taxation of the digitalized economy – indirect taxes

## EU Milestones – Indirect taxes





# Taxation of the digitalized economy

**Platform Reporting / Withholding Requirements**

# Platform reporting / withholding requirements

## Background/Introduction

The digitalization of the economy, especially with the advent of the gig and sharing economy, has created situations where taxable transactions may go undetected by tax authorities for direct tax and indirect tax purposes. Thus, more countries are beginning to impose information reporting obligations on platforms/intermediaries to report taxable activities. The purpose of these rules is to promote tax transparency and, in some cases, cooperation mechanisms between tax authorities.

## Summary chart of information reporting requirements that impact the digital economy

| Impacted Sector(s)       | Reporting Requirement  | Summary   | Status   |
|--------------------------|--|---|--|
| <b>Digital Platforms</b> | The OECD Model Rules for Reporting by Platform Operators with respect to Sellers in the Sharing and Gig Economy<br>(Model rules) | The OECD Model rules require digital platforms to report on the income realized by those offering accommodation, transportation, and personal services, as well as those selling goods, through platforms and to report the information to tax authorities. | As of February 15, 2023, 25 countries have signed the multilateral competent authority agreement (MCAA) for the automatic exchange of information under the rules. These are: Argentina Belgium, Bulgaria, Canada, Colombia, Costa Rica, Croatia, Cyprus, Estonia, Finland, Iceland, Ireland, Latvia, Luxembourg, Malta, Netherlands, New Zealand, Norway, Poland, Portugal, Slovak Republic, Slovenia, Spain, Sweden, United Kingdom. |

# Taxation of the digitalized economy – Platform reporting / withholding requirements

| Impacted Sector(s)                         | Reporting Requirement                               | Summary   | Status  |
|--|---|---|---|
|  | EU's Council Directive (EU) 2021/514(DAC7)          | Under DAC7, digital platform operators located both inside and outside the EU are required to report income earned by sellers on sales of goods, accommodation, personal services, and transportation services on their platforms. EU Member States are required to automatically exchange this information.  | EU member states were required to transpose the Directive into their local legislation by December 31, 2022. The Directive applies from January 1, 2023, throughout the EU, and the first reporting of data will be required by January 31, 2024. |
|  | Australia's Sharing Economy Reporting Regime (SERR) | The SERR imposes an information collection obligation on Electronic Distribution Platforms (EDP). An EDP is a service that allows sellers to make supplies available to buyers (for example, guests booking accommodation or passengers booking car rides), and is delivered via electronic communication. The rules apply to any platform regardless of residence provided that the transactions are connected with Australia, within the meaning of the GST law   | The rules are effective from July 1, 2023, if the transaction consists of short-term accommodation or taxi services (including ride sharing); or from July 1, 2024, for all other reportable transactions.  |
| <b>Crypto exchanges and intermediaries</b> | OECD's Crypto Asset Reporting Framework (CARF)      | The CARF provides for the reporting of tax information on transactions in Crypto-Assets in a standardized manner, with a view to automatically exchanging such information. It covers assets created, held, or transferred using decentralized technology, including stable coins, derivatives, and certain non-fungible tokens. Reporting Crypto-Asset Service Providers (RCSPs) must report four types of relevant transactions, including exchanges between crypto-assets and fiat currencies, and transfers of crypto-assets. | Coordinated implementation timelines for the CARF will be agreed to at a future date  |

# Taxation of the digitalized economy – Platform reporting / withholding requirements

| Impacted Sector(s)                      | Reporting Requirement   | Summary  | Status   |
|---|---|--|--|
|   | EU's Tax Transparency rules for crypto-asset transactions (DAC8)    | The DAC 8 proposal would require reporting crypto-asset service providers (RCASPs) to report on reportable transactions and transfers involving crypto assets and e-money. The proposal aligns with the EU's Regulation on Markets in Crypto-Assets (MiCA) and covers both domestic and cross-border exchanges and transfers of reportable crypto-assets, including non-fungible tokens (NFTs)   | EU Member States would need to transpose the Directive into national law by December 31, 2025. The rules would then become applicable from January 1, 2026 (with some exceptions). |
| <b>Payment Services Providers (PSP)</b> | EU information reporting requirement for payment service providers. | The PSP reporting rules require EU-established PSPs to transmit information on cross-border payments originating in EU Member States and on the beneficiary (the payee) of these cross-border payments. Under these rules, PSPs offering payment services in the EU must monitor the payees of cross-border payments and transmit information on those who receive more than 25 cross-border payments per quarter to the EU Member State's administration. This information is intended to be centralized in a European database, the Central Electronic System of Payment Information, (CESOP). | Reporting obligation is on a quarterly basis as from Q1 2024, with the first reporting due by April 30, 2024.  |

# Taxation of the digitalized economy – Platform reporting / withholding requirements

## Country specific detail – Platform reporting / withholding requirements

✓ Enacted

● Proposed / Announced

✗ Proposal rejected

| Country  | Status   | Latest development | Brief description   | Cite |
|----------|--|--------------------|---|------|
| China    | ✓  | Enacted            | September 29, 2025  | 1    |
|          | On June 20, 2025, China's State Administration of Taxation (SAT) issued regulations requiring digital platform operators to submit tax-related information in digital format and impose VAT withholding obligations for individual platform users. Effective immediately, platform operators must report business details within 30 days of implementation and submit quarterly reports on user identities and revenues. While operators must verify submitted information, they are not liable for inaccuracies provided by users. Individual platform users earning service income are subject to VAT, with internet platforms responsible for withholding VAT and related fees. Small-scale taxpayers earning below CNY 100,000 monthly are exempt, while those exceeding CNY 5 million annually must register independently for VAT filing. Authorities may notify platforms to withhold taxes if users exceed exemption thresholds across multiple platforms. |                    |   |      |
|          |  |                    | On September 25, 2025, the Chinese State Administration of Taxation clarified the tax reporting requirements for digital platform operators, effective October 1, 2025. Operators with annual online transactions exceeding CNY 100,000 across multiple stores must register, and platforms must remind users to register and display business licenses prominently. All income must be truthfully declared, with illegal income splitting and false reporting strictly prohibited. The regime applies to both resident and non-resident platforms, including cross-border transfers. Exemptions apply to small-scale traders and specified service providers. Fake platforms and businesses will be targeted to curb tax evasion and unfair competition. |      |
| Colombia | ✓  | Enacted            | September 30, 2025  | 2    |
|          |  |                    | On September 30, 2025, Colombia's tax authority (DIAN) issued Resolution 228 amending reporting obligations for digital platform operators. It clarifies scope for nonresident operators facilitating taxable activities, expands "relevant activities" definitions, and introduces due diligence standards. Reporting must include financial account identifiers when available, applying to the October–December 2025 reporting period.   |      |
| Denmark  | ✓  | Enacted            | October 2, 2025   | 3    |
|          | On October 2, 2025, Denmark published Executive Order No. 1155, establishing reporting obligations for crypto asset service providers under its implementation of the EU's DAC8 directive. Effective January 1, 2026, the order requires providers operating in Denmark to collect and report customer and transaction data, verify tax residency, and notify authorities of non-compliance. These obligations apply to both individuals and entities facilitating crypto asset exchanges or transfers for users in Denmark.   |                    |   |      |
|          | ✓  | Enacted            | October 2, 2025   | 4    |
|          |  |                    | On October 2, 2025, Denmark published Executive Order No. 1159 amending the DAC7 reporting obligations for digital platform operators. Effective January 1, 2026, the order introduces a new "Identification Service," allowing platform operators to verify sellers' identity and tax residence electronically. When using this service, operators must report only the seller's name, identification reference, and issuing Member State. Additionally, the Danish Tax Agency may now register or deregister platform operators in the EU's central register.   |      |

# Taxation of the digitalized economy – Platform reporting / withholding requirements

✓ *Enacted*

● *Proposed / Announced*

✗ *Proposal rejected*

| Country     | Status      | Latest development | Brief description  | Cite |
|-------------|-------------|--------------------|--|------|
| Finland     | ● Announced | October 09, 2025   | On October 9, 2025, the Finnish parliament accepted for consideration Bill No. HE 140/2025 vp, which proposes amendments to DAC7 and DAC8 reporting obligations for digital platform operators. The bill would require operators to conduct due diligence and report sales and rental activities involving sellers in jurisdictions participating in the Multilateral Competent Authority Agreement on Automatic Exchange of Information on Income Derived Through Digital Platforms (DPI MCAA). It mandates information exchanges within four months after each reporting period and sets January 31, 2027, as the first reporting deadline for non-EU countries, with exchanges commencing by April 30, 2027. If enacted, the law will take effect on January 1, 2026.   | 5    |
| Greece      | ✓ Enacted   | September 11, 2025 | On September 11, 2025, Greece signed the DPI MCAA, joining 31 other jurisdictions. The agreement, based on OECD Model Rules, enables automatic exchange of data collected by digital platform operators regarding income earned by sellers in the sharing and gig economy and through online sales. The DPI MCAA aims to strengthen transparency and compliance across jurisdictions through coordinated reporting.  | 6    |
| Indonesia   | ✓ Enacted   | July 15, 2025      | On July 14, 2025, Indonesia's Ministry of Finance issued Regulation No. 37/2025, which requires appointed domestic and qualifying non-resident e-commerce platforms to act as withholding agents by collecting 0.5 percent of domestic sellers' gross receipts at payment and remitting it monthly. The rule covers individuals and companies selling goods or services online, but exempts domestic traders with up to IDR 500 million in annual gross receipts who hold valid tax exemption certificates, as well as certain transactions. Domestic sellers must provide tax identification and gross-receipts status and notify the platform when they exceed the threshold, while platforms must issue proof of withholding, report transaction and taxpayer data, and file monthly tax returns.             | 7    |
| Pakistan    | ✓ Enacted   | August 7, 2025     | On June 27, 2025, Pakistan enacted the Finance Act 2025, which, among other things, requiring online platforms and other intermediaries to withhold between 0.25 percent and 2 percent on payments to resident sellers and file monthly and quarterly reports.<br>On August 4, 2025, the Pakistani tax authority issued Notification S.R.O. No. 1429(I)/2025, making online marketplaces, payment gateways, and couriers responsible for withholding and remitting sales tax on digitally ordered goods. They must issue deduction certificates and file monthly electronic statements (STR 34, STR 35, STR 36) by the 10th of the following month.  | 8    |
| South Korea | ✓ Enacted   | July 1, 2025       | Effective July 1, 2025, South Korea mandates certain non-resident digital intermediary service providers to collect and report monthly transaction details, such as information on transaction parties, number of transactions, and transaction amounts, to the Korean tax authority by the 15th of the month following each calendar quarter. These reporting requirements apply to non-resident providers, including online marketplace platforms, payment gateways, digital financial services, and foreign exchange dealers. The reporting requirement applies to transactions where the intermediary acts as a sales or settlement agent or otherwise facilitates the sale of goods or services. However, transactions involving the sale of goods or services by a foreign underlying seller are excluded. | 9    |

# Taxation of the digitalized economy – Platform reporting / withholding requirements

|         | ✓ Enacted  | ● Proposed / Announced | ✗ Proposal rejected  |      |
|---------|------------|------------------------|--|------|
| Country | Status     | Latest development     | Brief description  | Cite |
| Ukraine | ● Proposed | September 2, 2025      | On August 27, 2025, the Ministry of Finance of Ukraine announced Cabinet approval of a bill to align national rules with the EU's DAC7 (platform reporting rules) and the OECD Model Rules, and to implement automatic exchange of information (AEOI) under the Multilateral Competent Authority Agreement (MCAA) for income earned via digital platforms. The bill would require qualified digital platform operators (marketplaces and app-based intermediaries) to report seller information; withhold tax on qualified resident sellers with annual income under UAH 6.7 million at up to 5 percent, while withholding tax on nonqualified sellers at 18 percent; and exempt occasional sellers—no more than three platform sales totalling up to EUR 2,000 per year—from the extra bank account requirement.  | 10   |
| Vietnam | ✓ Enacted  | June 16, 2025          | On June 9, 2025, Vietnam issued Decree No. 117/2025/ND-CP, effective July 1, 2025, outlining the tax obligations for business activities on e-commerce platforms by individuals and households. The decree mandates that managing organizations of e-commerce platforms and organizations with other digital economic activities are responsible for deducting and paying VAT and personal income tax (PIT) on domestic revenue generated by these businesses. Managing organizations include platform owners or authorized managers who facilitate payments through various methods. They must withhold and pay VAT for domestic transactions and PIT for resident individuals or households on both domestic and international transactions, and for non-residents on domestic transactions. If e-commerce platforms lack direct payment functions, the tax responsibility falls on the business individuals or households themselves. | 11   |

## Citation – Platform reporting / withholding requirements

- 1 Bloomberg Tax, China Tax Agency Clarifies Tax Reporting Requirements for Internet Platform Enterprises (September 29, 2025)
- 2 KPMG member firm in Colombia
- 3 KPMG member firm in Denmark

## Taxation of the digitalized economy – Platform reporting / withholding requirements

---

- 4 Denmark - Denmark Amends DAC7 Reporting Obligations for Digital Platform Operators (October 7, 2025), News IBFD
- 5 Bloomberg Tax, Finland Parliament Considers Bill to Amend Reporting Requirements for Digital Platform Operators Under DAC7, DAC8 (October 14, 2025)
- 6 Greece - Greece Signs Multilateral Agreement on Automatic Exchange of Information with Respect to Income Earned on Digital Platforms (DPI MCAA) (October 8, 2025), News IBFD
- 7 Indonesia - MoF Mandates E-Commerce Platforms Withhold Income Tax from Domestic Traders (July 15, 2025), News IBFD
- 8 Bloomberg Tax, Pakistan – Pakistan Tax Agency to Amend Sales Tax Rules for Online Sales (August 7, 2025)
- 9 KPMG member firm in South Korea
- 10 Bloomberg Tax, Ukraine - Ukraine MOF Announces Cabinet Approval of Bill on Digital Platform Reporting Under DAC7, OECD Rules (September 2, 2025)
- 11 Vietnam - Government Issues New Decree on Tax Administration of E-Commerce Activities for Individuals and Households (16 June 2025), News IBFD





**Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates or related entities.**

**[www.kpmg.com](http://www.kpmg.com)**

**[kpmg.com/socialmedia](https://kpmg.com/socialmedia)**



The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act upon such information without appropriate professional advice after a thorough examination of the particular situation.

© 2025 KPMG LLP, a Delaware limited liability partnership and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved. NDP401649-1A

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.