

Flash Alert

Monthly Summary (December 2014)

Flash Alerts	
Australia	<p><u>Division 293 Tax: Payment/Refund Consequences for Expatriates, Nonresidents</u> An additional layer of tax of 15 percent (known as "Division 293 tax") is imposed on concessional Australian superannuation contributions for high-level income earners. This provision has been in effect since 1 July 2012. The ramifications for Australia inbound and outbound expatriates and Australian nonresidents of this often-misunderstood tax are discussed and clarified in this newsletter.</p>
Denmark	<p><u>New Rules for Recruitment of Foreign Specialists</u> Denmark is implementing a new Fast Track procedure as a means of making it easier to recruit highly qualified employees/specialists to come to work in Denmark and strengthen the competitive edge of Danish companies. Also, with effect from January 1, 2015, the minimum salary under the Special Taxation Scheme for Key Employees will be reduced by DKK 10,000.</p>
Estonia	<p><u>Tax, Unemployment Insurance, and Foreign National Employment Registration Developments</u> Recent developments in Estonia include new registration rules for resident/nonresident foreign individuals working in Estonia and a modification to the flat tax rate for individuals and the unemployment insurance rate, as well as changes to the taxation of directors' fees paid to nonresident board members.</p>
Finland	<p><u>For Budget 2015 Some Tax Changes; Rise in Some Social Charges</u> In its budget proposals for 2015, the Finnish government adjusted upwards the personal income tax thresholds and tax credits, restricted mortgage interest deductibility, and modified the deduction for commuting expenses. In addition, social security rates, for the most part, have been increased slightly.</p>

IN THIS ISSUE

[Flash Alerts \(December\)](#)
[Videos](#)

ALL GMS PUBLICATIONS

[Flash Alert](#)
[Global Assignment Policies and Practices Survey](#)
[Payroll Insights](#)
[Tax Rates Online](#)
[Taxation of International Executives \(TIES\) Online](#)
[The Expatriate Administrator](#)
[Thinking Beyond Borders: Management of Extended Business Travelers](#)
[U.S. Taxation of Americans Abroad](#)
[U.S. Taxation of Foreign Citizens](#)
[Your Assignment Abroad: The 50 Most Common Concerns](#)

Germany	<p><u>Immigration Scammers Making Phone Calls with Threats to Foreign Nationals</u></p> <p>According to a report by Germany's Ministry of the Interior, Indian nationals in Germany have been subject to fraudulent telephone immigration-related calls by scammers seeking money or personally identifiable information. While up to this point only Indian nationals have been subject to these fraudulent calls, it is possible that other foreign nationals in Germany may be at risk.</p>
Netherlands	<p><u>2015 Salary Criteria for Highly-Skilled Migrants Announced</u></p> <p>Dutch-based companies that have acquired official status as "Recognized Sponsor" from the Dutch immigration authorities may benefit from expedited immigration procedures with respect to their so-called qualifying highly-skilled migrants. Companies that make use of the procedure need to be aware of the new criteria to determine if their employees satisfy the conditions which apply to every application filed after January 1, 2015.</p>
Singapore	<p><u>Extension of Time to File Tax Clearance for Frequent Business Travellers</u></p> <p>To help alleviate the practical difficulties experienced by employers, Singapore's tax authority has advised it is prepared to grant an extension of time to file Forms IR21 of Frequent Business Traveller (FBT) employees who exceeded 60 days of business stay in Singapore in a calendar year.</p>
Spain	<p><u>Tax Reform Law Enacted, with Many Changes to Taxation of Individuals</u></p> <p>Spain's recent tax reform law contained several measures affecting individuals including changes to personal income tax rates and thresholds, the taxation of savings and capital gains, as well as the so-called "impatriate" tax regime. These and other changes will alter in a significant way the taxation of individuals' personal income – particularly those individuals on assignment – and their income arising from savings, investments, and "wealth." Many of the measures are set to take effect on January 1, 2015.</p>
Sweden	<p><u>New Guidance for Employers Regarding Non-EU/EEA/Swiss Nationals</u></p> <p>The Swedish Migration Board has issued a regulation clarifying employer obligations under Swedish law (the Alien Act) when a citizen from a</p>

	<p>country outside the European Union (EU), European Economic Area (EEA), or Switzerland is hired or posted to work in Sweden. Employers need to be aware of their notification, registration, and documentation/record-keeping requirements.</p>
United Kingdom	<p><u>Draft Finance Bill Published, Reflecting Many Autumn Statement Measures</u></p> <p>The U.K.'s draft 2015 Finance Bill was published on December 10, 2014. Covered in this newsletter are developments and proposals related to tax thresholds and rates for income tax, capital gains tax, and National Insurance Contributions (NICs), as well as allowances, etc.; an increase in the Remittance Basis Charge; treatment of gains on the sale of U.K. property by non-U.K. residents and of non-U.K. property by U.K. residents; and the relationship between the new 90-day rule and the Statutory Residence Test.</p>
United Kingdom	<p><u>Plans Set to Tax Sales of Residential Properties by Nonresidents</u></p> <p>The U.K. government has published the responses to the consultation on its plans to make gains made by non-U.K. residents on the sale of U.K. residential property subject to capital gains tax (CGT) from 6 April 2015. The government has now confirmed its intention to implement the changes from next April. The changes will also apply to U.K. residents who are disposing of residential property located outside the United Kingdom. New reporting and payment regimes are to be introduced with the onus on the taxpayer to report and pay tax within the new deadlines.</p>
United Kingdom	<p><u>Tax Simplification and Some Give and Take in Autumn Statement</u></p> <p>The U.K. Chancellor of the Exchequer's Autumn Statement, announced on December 3, 2014, contains several proposals among which: adjustments to the income tax, National Insurance Contribution, and capital gains taxation thresholds; modifications to related allowances; some increases to the Remittance Basis Charge; new anti-abuse/fairness measures; and removal of the threshold amount below which employees do not pay income tax on certain benefits-in-kind.</p>
United States	<p><u>Certain Individuals Relieved of FBAR Filing Until June 30, 2016</u></p> <p>The U.S. Treasury Department's Financial Crimes Enforcement Network (FinCEN) has issued</p>

	<p>FinCEN Notice 2014-1, to further extend – until June 30, 2016 – the filing due date for certain individuals (employees or officers of specified regulated entities) with only signature authority over, but no financial interest in, certain foreign financial accounts to file an FBAR, or Report of Foreign Bank and Financial Accounts, FinCEN Form 114.</p>
United States	<p><u>Final FATCA Regs Include Significant Changes</u> The U.S. Department of the Treasury and Internal Revenue Service recently released final regulations (T.D. 9706) that, among other things, may make foreign financial asset reporting easier for taxpayers with certain deferred compensation and for those who are dual residents. The regulations concern I.R.C. section 6038D, Information with Respect to Foreign Financial Assets, which requires U.S. taxpayers to report ownership of specified foreign financial assets with their U.S. income tax returns, to the extent the total value of those assets exceeds certain threshold amounts.</p>
United States	<p><u>Following Passage in Congress, President Signs Tax Extenders Bill</u> On December 19, 2014, President Obama signed into law the Tax Increase Prevention Act of 2014. The Act retroactively extends through 2014 most of the tax provisions that would otherwise have expired at the end of 2013 or during 2014. Passage of the Act removes the uncertainty as to whether certain tax benefits would be available to taxpayers on their 2014 tax returns. However, because the extension provided in the Act only applies through 2014, additional legislative action will be required to extend these provisions for 2015.</p>

Videos	
United States	<p><u>Understanding What the Affordable Care Act Means for Expatriates and Their Health Care Plans (Part 1)</u> In the immediate aftermath of the passage of the health care reform laws in 2010, there were many questions about the impact of the new rules on U.S. assignees abroad and foreign nationals working in the United States and their health care plans. These questions continue to challenge assignees and their assignment program managers. In this video, we consider several of these questions and issues, and highlight things for</p>

	<p>employers to consider regarding the requirement to offer certain health care coverage (the employer shared responsibility requirement) – as well as the requirement for individuals to obtain coverage (the individual shared responsibility requirement) – as they apply to foreign nationals in the United States and U.S. assignees working overseas.</p> <p>(Part 2 will be released shortly, so stay tuned!)</p>
--	--

To unsubscribe or change your contact information, please send an e-mail to: go-fmiesflash@kpmg.com.

[Privacy](#) | [Legal](#)

You have received this message from KPMG LLP. If you wish to unsubscribe from Flash Alert, please [click here](#). If you wish to unsubscribe from all KPMG communications, please [click here](#).

KPMG LLP, 1801 K Street, NW, Suite 12000, Washington, DC 20006

© 2015 KPMG LLP, a Delaware limited liability partnership and the U.S. member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative (“KPMG International”), a Swiss entity. All rights reserved. 32647WDC

The KPMG name, logo and “cutting through complexity” are registered trademarks or trademarks of KPMG International.