

Deloitte Tax looks at Trump's trade and tariff agenda, section 987 rules, Pillar Two, and the Corporate AMT

New alerts from Deloitte Tax LLP discuss President Donald Trump's trade and tariff agenda, guidance under section 987, the OECD rules on Pillar Two, and the corporate alternative minimum tax.

Trump administration's America first trade policy, potential tariffs on horizon for Mexico/Canada/China goods, CBP proposed action to limit *de minimis* rule

President Trump started his second term as US President by taking several actions to implement his campaign proposals on tariffs and trade. US importers should consider preparing now for the potential impacts from Trump administration actions that seem to be coming soon.

The alert provides details of the new actions ordered in the "America First Trade Policy;" potential tariffs on Canada, Mexico, and China; and what US importers and businesses can do to prepare.

Details of the Trump administration's policies are provided in a new alert from Deloitte Tax LLP.

URL: <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/dttl-tax-alert-us-23-january-2025.pdf>

Treasury, IRS release final and proposed regulations under section 987 and related rules

On December 11, 2024, Treasury and the IRS released final currency regulations under section 987 and related rules. Section 987 generally applies to taxpayers with a "flow-through" qualified business unit (QBU) if the QBU has a functional currency that is different than the functional currency of its tax owner(s). The Final Regulations generally retain the key elements of the proposed regulations issued in November 2023 while introducing changes that are intended to provide certain administrative and substantive relief.

Treasury and the IRS also issued proposed regulations that mainly provide an election for the simplified treatment of certain recurring ordinary-course disregarded transactions between an owner and its section 987 QBU.

Details of the new guidance are provided in a new alert from Deloitte Tax LLP.

URL: <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/dttl-tax-alert-us-23a-January-2025.pdf>

New OECD guidance addresses Pillar Two incentives and administration

On January 15, 2025, the OECD/G20 inclusive framework (IF) released the latest package of materials related to the 15 percent global minimum tax on multinational corporations ("Pillar Two" or GloBE). The guidance (hereafter, "the January 2025 AG") addresses the application of the Article ("Art.") 9 transition rules to certain deferred tax assets (DTAs) arising prior to the application of the GloBE rules.

This alert addresses the guidance under Art. 9.1.2 and related provisions. The updates to the GIR and list of qualified regimes will be addressed in a future alert.

URL: <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/dttl-tax-alert-us-19-january-2025.pdf>

Corporate Alternative Minimum Tax proposed regulations – technical corrections issued

On December 26, Treasury and the IRS published in the Federal Register technical corrections to the corporate alternative minimum tax proposed regulations (CAMT), released on September 13, 2024. The proposed regulations provide guidance on the application of the CAMT under sections 55, 56A, and 59(k) and(l). For more background on the CAMT proposed regulations, see our prior tax alert and related appendix.

URL: https://dhub.deloitte.com/Newsletters/Tax/2024/TNV/240927_2_suppA.pdf

URL: https://dhub.deloitte.com/Newsletters/Tax/2024/TNV/240927_2_suppB.pdf

Details of the new guidance are provided in a new alert from Deloitte Tax LLP.

URL: https://dhub.deloitte.com/Newsletters/Tax/2025/TNV/250124_5_suppA.pdf

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