

Trump administration and congressional Republicans consider tax and withholding increases in response to Pillar Two and DSTs

The Trump Administration and House Republican taxwriters are separately considering US tax increases on investors from countries that impose undertaxed profits rules (UTPRs), digital services taxes (DSTs), or other “discriminatory or extraterritorial taxes” on US citizens or corporations.

While both efforts appear focused on deterring UTPRs and DSTs by threatening to impose tax burdens on inbound foreign investment, the details of the two provisions differ significantly, as described in this alert by Deloitte Tax LLP.

URL: <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/dttl-tax-alert-us-13-february-2025.pdf>

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