BCC TAX & LEGAL NEWSLETTER 2025 #5

Dear Friend of the Chamber,

The objectives of the British Chamber of Commerce for Luxembourg are to follow and influence developments in the economic and business world in Luxembourg affecting members' interests, and so contribute to making Luxembourg an attractive place to do business. The Tax and Legal groups of the BCC address key issues in their sectors to corporate and individual members through a number of events, and seek to raise awareness and influence decision-makers as to the issues of concern to the BCC membership.

The purpose of the BCC Tax and Legal newsletters is to provide additional regular bimonthly updates on key tax and legal developments in Luxembourg that may be relevant to your business. The present newsletters issued by member firms of the Tax and Legal groups cover the period from July to August 2025. If you deem that another person within your organisation should receive this email, please let us know. If you wish to unsubscribe please contact the BCC Secretariat by email to info@bcc.lu.

Tax Newsletter

PwC:

- Circular of the Luxembourg tax authorities on the CIV carve-out of the reverse hybrid rules
- Crypto-Assets and CRS Compliance: DAC 8 redefines the rules
- <u>Luxembourg amends Pillar 2 Law to implement automatic exchange of GloBE Information Returns and OECD guidance</u>
- <u>Luxembourg introduces revised carried interest regime to enhance the country's attractiveness for the</u> private equity and alternative investment industry

KPMG:

- <u>Luxembourg Tax Alert 2025-03: Major step towards modernizing the personal taxation of carried interest in Luxembourg</u>
- <u>Luxembourg Tax Alert 2025-04: New Bill Implementing DAC9 and Additional Amendments to Pillar Two Law</u>
- Luxembourg Tax Alert 2025-05: ATAD 2 Clear guidelines for Luxembourg investment funds

DELOITTE:

- CJEU ruling on the VAT valuation of intragroup services
- Pillar Two law update and implementation of automatic exchange of GloBE Information Return

LINKLATERS:

• Luxembourg Government proposes reform of carried interest tax regime

EY:

- Luxembourg carried interest proposal would make significant changes
- <u>Luxembourg to transpose DAC8</u>, extending automatic information exchange on crypto assets, life <u>insurance income</u>, tax rulings for individuals and digital <u>currencies</u>

• <u>Luxembourg proposes legislation on GloBE Information Return, exchange of information and</u> Administrative Guidance on Article 9.1

Legal Newsletter

BANKING:

AKD

• Roadmap to securitisation in Luxembourg 2025

CORPORATE / M&A:

A&O SHEARMAN

• Luxembourg Case Law Briefing – Corporate Law Highlights 2025

BSP

• Toward a paperless state: Electronic signatures supporting Luxembourg's digital transformation

DATA PROTECTION:

BAKER & MCKENZIE

• EU reaches agreement to streamline cross-border GDPR enforcement

EMPLOYMENT:

BSP

• <u>Draft Law to amend the law of 29 August 2008 on the free movement of persons and immigration:</u> between the desire for integration and the need to manage migratory flows

ESG:

MOURANT OZANNES LUXEMBOURG

• European Green Bonds and Luxembourg's role in shaping sustainable finance

PINSENT MASONS LUXEMBOURG

• ESMA note underlines greenwashing focus as financial firms urged to be vigilant

FINANCIAL REGULATIONS:

A&O SHEARMAN

• EBA's draft regulatory technical standards elaborate on requirements for EU branches of non-EU banks

CLIFFORD CHANCE

- Buy-side Regulatory Horizon Scanner Q3 2025
- Sell Side Horizon Scanner Q3 2025

INVESTMENT FUNDS:

AKD

• Alternative Investment Funds Industry Quarterly Update Q2 2025

BAKER & MCKENZIE

• Clearer and broader tax framework announced for carried interest to attract fund managers

BSP

• EU Startup and Scaleup Strategy | "Choose Europe to Start and Scale"

CLIFFORD CHANCE

• <u>"CSSF Circular 25/894 and FAQ – Notification requirements for Luxembourg investment fund managers managing non-authorised investment funds"</u>

LINKLATERS LLP

CSSF clarifies notification duties for Luxembourg fund managers managing specific investment funds.

PROPERTY TAX REFORM:

DSM

• Property tax reform: a substantial overhaul of the bill

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Best regards,

BCC Secretariat