



TaxNewsFlash

United States



No. 2020-512
August 13, 2020

KPMG report: Analysis of final and proposed regulations, high-tax exception under GILTI and subpart F

The U.S. Treasury Department and IRS in July 2020 released for publication in the Federal Register final regulations relating to the “global intangible low-taxed income” (GILTI) high-tax exclusion and proposed regulations relating to both the GILTI high-tax exception and the subpart F high-tax exception.

Read an [August 2020 report](#) [PDF 657 KB] prepared by KPMG LLP that provides a detailed discussion of and observations about the final GILTI high-tax exception as well as the proposed high-tax exception.

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