

# KPMG Japan e-Tax News

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## TAX UPDATE

### 2023 TAX REFORM — PROMULGATION OF MINISTERIAL ORDINANCES FOR THE INCOME INCLUSION RULE

By virtue of the 2023 tax reform, the Income Inclusion Rule ('IIR') which is one of the Global Anti-Base Erosion Rules ('GloBE Rules') of 'Pillar 2' agreed by the OECD/G20 Inclusive Framework on BEPS, was enacted<sup>(\*)1</sup>.

On 30 June 2023, the ministerial ordinances for the IIR were promulgated in the extra issue No.137 of the official gazette<sup>(\*)2</sup>.

<sup>(\*)1</sup> We set out the outline of the IIR in the Tax Newsletter '[Outline of the 2023 Tax Reform Proposals](#)' issued on 22 December 2022.

<sup>(\*)2</sup> The tax laws and the cabinet orders for the IIR had already been promulgated on 31 March 2023 and 16 June 2023, respectively<sup>(\*)3</sup>.

<sup>(\*)3</sup> We set out the information of the promulgation of cabinet orders for the IIR in the e-Tax News No.282 '[2023 Tax Reform - Promulgation of Cabinet Orders for the Income Inclusion Rule](#)' issued on 19 June 2023.

## KPMG Tax Corporation

### Tokyo Office

Izumi Garden Tower,  
1-6-1 Roppongi, Minato-ku,  
Tokyo 106-6012  
TEL : +81 (3) 6229 8000  
FAX : +81 (3) 5575 0766

### Osaka office

Osaka Nakanoshima Building 15F,  
2-2-2 Nakanoshima, Kita-ku,  
Osaka 530-0005  
TEL : +81 (6) 4708 5150  
FAX : +81 (6) 4706 3881

### Nagoya office

Dai Nagoya Building 26F,  
28-12 Meieki 3-chome, Nakamura-ku,  
Nagoya 450-6426  
TEL : +81 (52) 569 5420  
FAX : +81 (52) 551 0580

### Kyoto Office

Nihon Seimei Kyoto Yasaka Building 7F,  
843-2 Higashi Shiokoji-cho,  
Shiokoji-dori Nishinotoin-higashiiru, Shimogyo-ku,  
Kyoto 600-8216  
TEL : +81 (75) 353 1270  
FAX : +81 (75) 353 1271

### Hiroshima Office

Hiroshima Kogin Buiding 7F,  
2-1-22 Kamiya-cho, Naka-ku,  
Hiroshima 730-0031  
TEL : +81 (82) 241 2810  
FAX : +81 (82) 241 2811

### Fukuoka Office

Kamiyo Watanabe Building 4F,  
1-12-14 Tenjin, Chuo-ku,  
Fukuoka 810-0001  
TEL : +81 (92) 712 6300  
FAX : +81 (92) 712 6301

[info-tax@jp.kpmg.com](mailto:info-tax@jp.kpmg.com)  
[home.kpmg/jp/tax-en](http://home.kpmg/jp/tax-en)

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