



Asia Pacific Tax Weekly

KPMG Asia Pacific Tax Centre | Content to 13 July 2017



Asia Pacific Tax Developments

Asia Pacific

Asia Pacific: Implementation issues associated with CbCR – Reporting financial information

With deadlines for filing the first Country-by-Country (CbC) reports fast approaching, many multinational enterprise (MNE) groups are busy doing their best to obtain necessary information, to make sense of that information and to get their CbC reports into a format ready for filing. One issue for MNE groups relates to working out what financial information should be reported in Table 1 of the CbC report, which stem from interpretational matters, data availability and tax risk management.

[More details](#)

Asia Pacific: On the cusp of a brave new transfer pricing world

More Asia Pacific countries have adopted CbC Reporting over the past year, and the filing deadline for the first CbC report is drawing ever closer. Further, and notwithstanding the guidance provided by the Organisation for Economic Co-operation and Development (OECD), and by individual countries to facilitate the swift and uniform implementation of CbC Reporting, implementation issues of an interpretative and practical nature continue to arise.

[More details](#)

Australia

Australia: The State of Origin: Act against Act, Fact against Fact

Country of origin labelling requirements for the sale of goods in Australia were simplified in February 2017 with the introduction of the Competition and Consumer Amendment (Country of Origin) Act 2017. The amendment applies to any products sold in Australia for consumer consumption and clarifies the conditions of the substantial transformation test. However, a difficulty for players in the importing space is that the Competition and Consumer Act rules do not necessarily align with the rules of origin in all pieces of legislation.

[More details](#)

Hong Kong SAR

Hong Kong: AEOI portal is open for financial institutions

The Inland Revenue Department of Hong Kong on 3 July 2017 announced information concerning the automatic exchange of information (AEOI) portal.

- The AEOI portal is now available to financial institutions.
- Financial institutions maintaining reportable accounts before 3 July 2017 are required to register the accounts under the AEOI portal and submit a notification of commencement of maintaining reportable accounts no later than 3 October 2017.
- A trial run of the AEOI portal has been organized.

[More details](#)

Hong Kong: Profits Tax exemption for privately offered open-ended fund companies

The Hong Kong Government has published a Bill to confer a Profits Tax exemption on Hong Kong privately offered open-ended fund companies (OFCs). The Bill will enable asset managers to set up a privately offered fund as an OFC in Hong Kong which will not be subject to tax.

[More details](#)

Malaysia

Malaysia: Updated guidelines for transfer pricing

The Malaysian Inland Revenue Board announced new updates and changes to the Transfer Pricing Guidelines 2012. For taxpayers engaged in controlled transactions with related parties or associated person(s), this updated guidance now incorporates measures as to how taxpayers are to manage and document their intercompany transactions.

[More details](#)

Myanmar

Myanmar: Myanmar liberalization of trading in 2017

In 2015 and 2016, the Ministry of Trade and Commerce issued notifications to allow the trading of fertilizer, seeds, herbicides, medical equipment and construction materials. However, in prior notifications, only joint ventures were allowed to undertake these activities.

The Ministry of Trade and Commerce has recently issued notification 36/2017 on 12 June 2017 to further liberalise these restrictions by allowing wholly foreign owned entities to undertake the trading of the above items.

[More details](#)

Thailand

Thailand: New Law – Aliens' Working Management Emergency Decree

A new law impacting employers and foreign employees were recently issued. The main objective of the new law is to improve the management of foreigners working in Thailand so that it can be carried out systematically and efficiently. The new law provides protection and facilitation to both employers and foreign employees, and imposes stricter punishment provisions and penalties for those who violate the law.

[More details](#)

Calendar of Events

Date	Event	Location
18 July -19 July 2017	KPMG Corporate Treasury Management Course Contact person: Mr Andre Roscoe More details	The St. Regis Singapore

Significant International Tax Developments



OECD: Cameroon signs multilateral convention to implement BEPS

The Organisation for Economic Cooperation and Development (OECD) announced that a representative of the government of Cameroon signed the multilateral instrument that will allow Cameroon to address tax avoidance by multinational enterprises pursuant to the base erosion and profit shifting project.

[More details](#)

OECD: Draft contents of 2017 update to Model Tax Convention

The OECD Committee on Fiscal Affairs released the draft contents of the 2017 update to the OECD Model Tax Convention.

[More details](#)

OECD: Updates to transfer pricing guidelines for multinational enterprises

The OECD announced the release of the 2017 edition of the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations.

[More details](#)

Beyond Asia Pacific

France: Tax announcements, proposals of new French government

The French prime minister last week presented to the French National Assembly, the first tax measures expected to be implemented in the very near future. These measures would (in all likelihood) be included in the draft Finance Law for 2018, to be submitted to the French Parliament during the fall 2017. Many of the proposals would aim at increasing the competitiveness of the French marketplace.

[More details](#)

United Kingdom: Great British breakfast, with a side of Brexit

The key ingredients of a fry-up could cost nearly 13% more if WTO rules come into effect. Orange juice and olive oil are among the items noting the biggest increase in customs tariff. Retailers need to understand their supplychains at a granular level.

[More details](#)

TaxNewsFlash by Region

For the latest tax developments from other regions see the following links:

[Africa](#)

[Americas](#)

[Europe](#)

[United States](#)

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