



KPMG Asia Pacific Tax Weekly

KPMG Asia Pacific Tax Centre | Content to 04 January 2018



Asia Pacific Tax Developments

China

China: Guidance clarifying country-by-country reporting, information exchange

China's tax authority in 2016 issued guidance concerning the administration of related-party declarations and contemporaneous documentation, and recently issued an announcement clarifying that certain provisions of country-by-country (CbC) reporting will not apply for the CbC report for 2016.

[More details](#)

China: Landmark US tax reform to be signed into law – Changes effective January 2018

US tax reform legislation was passed by both Houses of Congress after the US House of Representatives voted to approve the measure. The legislation, commonly known as the Tax Cuts and Jobs Act (TCJA) is expected to be signed into law by President Donald Trump on 3 January 2018.

[More details](#)

Hong Kong SAR

Hong Kong: Introduces BEPS bill marking a significant step up in its transfer pricing enforcement regime

The Inland Revenue (Amendment) (No.6) Bill 2017 was recently gazetted, thereby introducing a mandatory transfer pricing regime and anti-BEPS changes to Hong Kong. The BEPS bill marks a significant step up in Hong Kong's transfer pricing enforcement regime.

[More details](#)

Hong Kong Two-tiered profits tax regime introduced

A new two-tiered profits tax rate regime was introduced in Hong Kong on 29 December 2017 when a “profits tax bill” was gazetted. The key objective of the profits tax bill is to maintain a competitive taxation system to promote economic development while maintaining a simple and low tax rate regime.

[More details](#)

India

India: Taxpayer’s aggregation of IT services and ITeS provided to Associated Enterprises under a single composite contract upheld

With reference to OECD’s TP guidelines, BEPS Action 8-10, the Kolkata Bench of Income-tax Appellate Tribunal upholds taxpayer’s aggregation of Information Technology services and Information Technology enabled services provided to Associated Enterprises under a single composite contract.

[More details](#)

Japan

Japan: Updated FAQs on common reporting standard

Japan’s tax agency has issued an updated version of “frequently asked questions” (FAQs) on the use of Dormant Account attribute and country codes.

[More details](#)

Singapore

Singapore: Cutting through the complexity of the FRS 109 tax treatment

The Inland Revenue Authority of Singapore (IRAS) has recently issued an e-Tax Guide on “Income Tax Treatment Arising from Adoption of FRS 109 – Financial Instruments”. This article highlights the difference between the FRS 39 and FRS 109 tax treatments.

[More details](#)

Taiwan

Taiwan: E-services income tax regime

Following the implementation of the VAT regime on e-services provided by foreign e-services providers in 2016, the Ministry of Finance has recently promulgated the relevant income tax regime. Similar to the VAT regime, the income tax regime focuses on the revenue received by foreign e-services providers from their e-services provided to onshore Taiwan customers.

[More details](#)

Significant International Tax Developments



OECD: Jurisdictions implement final regulations for first filings of country-by-country reports

The OECD announced the activations of automatic exchange relationships for CbC reporting in accordance with the base erosion and profit shifting (BEPS) Action 13 minimum standard.

[More details](#)

OECD: CRS information update; over 2,600 exchange relationships

The OECD announced a series of bilateral exchange relationships established under the common reporting standard (CRS) Multilateral Competent Authority Agreement (CRS MCAA), providing a total of over 2,600 bilateral relationships for the automatic exchange of CRS information in place (up from over 2,000 relationships from four months ago).

[More details](#)

Thought Leadership



End of the road to enactment of the US Tax Reform

The US tax president, Donald Trump has on December 22, 2017, signed into law, H.R. 1, originally known as the "Tax Cuts and Jobs Act (TCJA)". The TCJA is the most significant overhaul of the US tax rules since 1986 and it will have significant impact on individuals and businesses.

[More details](#)

Global Tax Disputes Update – December 2017

With tax audit and dispute activity rising in almost every country, keeping up with trends and developments is more important than ever. In this edition, you'll find briefings on key news, events and thought leadership submitted by Global Tax Dispute Resolution & Controversy professionals in KPMG member firms worldwide.

[More details](#)

Calendar of Events

Date	Event	Location
09 January 2018 - - 11 January 2018	U.S. Tax Reform Seminar More details	KPMG Office, 8th Floor, Prince's Building, 10 Chater Road, Central, Hong Kong
11 January 2018	Employer's Tax Obligations Workshop (Fundamental) (Re-Run) Contact person: Lam Pei Ming More details	One World Hotel, Petaling Jaya Malaysia

Beyond Asia Pacific

Argentina: Tax reform measures are enacted

The Argentine government has issued a decree enacting and making effective comprehensive tax reform. The changes introduced by the tax reform are aimed at promoting investment and competitiveness, and moving Argentina towards a more equitable, efficient, and modern tax system.

[More details](#)

EU: Provisions for implementation, design of ultimate beneficial ownership registers advance

On December 20, 2017, EU ambassadors confirmed that agreement had been reached between the European Parliament and the Council regarding the latest amendments to the Anti-Money Laundering Directive (AMLD 5). The amended Directive contains especially extended provisions regarding the implementation and design of Ultimate Beneficial Ownership registers within the EU

[More details](#)

TaxNewsFlash by Region

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

[Africa](#)

[Americas](#)

[Europe](#)

[United States](#)

KPMG Asia Pacific Tax Centre Contacts

Asia Pacific Regional Leader, Tax



Khoon Ming Ho
Head of Tax, KPMG Asia Pacific
T : +8610 8508 7082
E : khoonming.ho@kpmg.com

Asia Pacific Tax Centre Leader, Regional Tax Partner



Brahma Sharma – KPMG Asia Pacific Limited
Asia Pacific Tax Centre Leader, Regional Tax Partner
T : +65 8186 7369
E : brahmasharma@kpmg.com.sg

Service Line Specialists

Transfer Pricing Services



Tony Gorgas – KPMG Australia
Asia Pacific Regional Leader, Transfer Pricing Services
T : +61 2 9335 8851
E : tgorgas@kpmg.com.au

Financial Services Transfer Pricing



John Kondos – KPMG China
Asia Pacific Regional Leader, Transfer Pricing Services in the Financial Services Sector
T : +852 2685 7457
E : john.kondos@kpmg.com

Indirect Tax Services



Lachlan Wolfers – KPMG China
Asia Pacific Regional Leader, Indirect Tax Services
T : +852 2685 7791
E : lachlan.wolfers@kpmg.com

Research & Development (R&D) Tax Incentives



Alan Garcia – KPMG Australia
Asia Pacific Regional Leader, R&D Tax Incentives
T : +61 3 9288 6094
E : afgarcia@kpmg.com.au

Global Compliance Management Services

Global Mobility Services



Oi Leng Mak – KPMG in Singapore
Asia Pacific Regional Leader,
Global Compliance Management
Services

T : +65 6213 7319
E : omak@kpmg.com.sg



Ben Travers – KPMG Australia
Asia Pacific Regional Leader,
Global Mobility Services

T: +61 3 9288 5279
E: btravers1@kpmg.com.au

International Tax



Christopher Xing – KPMG China
Asia Pacific Regional Leader,
International Tax

T : +8610 8508 7072
E : christopher.xing@kpmg.com

Deal Advisory M&A Tax



Angus Wilson – KPMG Australia
Asia Pacific Regional Leader,
Deal Advisory M&A Tax

T: +61 2 9335 8288
E: arwilson@kpmg.com.au

Dispute Resolution and Controversy



Angela Wood – KPMG Australia
Asia Pacific Regional Leader,
Dispute Resolution and
Controversy

T: +61 3 9288 6408
E: angelawood@kpmg.com.au

Legal Services



David Morris – KPMG Australia
Asia Pacific Regional Leader,
Legal Services

T: +61 2 9455 9999
E: davidpmorris@kpmg.com.au

Market Sector Specialists

Financial Services



Christopher Abbiss – KPMG China
Asia Pacific Regional Tax
Leader,
Financial Services and Banking
Sector

T: +852 2826 7226
E: chris.abbiss@kpmg.com

Alternative Investments & Private Equity



Simon Clark – KPMG in Singapore
Asia Pacific Regional Tax Leader,
Alternative Investments and
Private Equity sector

T : +65 6213 2152
E : simonclark1@kpmg.com.sg

Sovereign Wealth and Pension Funds

Energy & Natural Resources



Angus Wilson – KPMG Australia
Asia Pacific Regional Leader,
Sovereign Wealth and Pension
Funds Sector

T: +61 2 9335 8288
E: arwilson@kpmg.com.au



Carlo Franchina – KPMG in
Australia
Asia Pacific Regional Tax Leader,
Energy & Natural Resources
Sector

T: +61 8 9263 7239
E: cfranchina@kpmg.com.au

Insurance



John Salvaris – KPMG Australia
Asia Pacific Regional Leader,
Insurance Sector

T: +61 3 9288 5744
E: jsalvaris@kpmg.com.au

<https://home.kpmg.com/xx/en/home/services/tax/regional-tax-centers/asia-pacific-tax-centre.html>

www.kpmg.com/tax

kpmg.com/socialmedia



kpmg.com/app



The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act upon such information without appropriate professional advice after a thorough examination of the particular situation.

© 2018 KPMG International Cooperative ("KPMG International"), a Swiss entity. Member firms of the KPMG network of independent firms are affiliated with KPMG International. KPMG International provides no client services. No member firm has any authority to obligate or bind KPMG International or any other member firm vis-à-vis third parties, nor does KPMG International have any such authority to obligate or bind any member firm. All rights reserved.

The KPMG name and logo are registered trademarks or trademarks of KPMG International.