



KPMG Asia Pacific Tax Weekly

KPMG Asia Pacific Tax Centre | 13 August 2024



Asia Pacific Tax Developments

Australia

[Guidance on withholding tax obligations on certain payments to nonresidents](#)

The Australian Taxation Office released guidance on withholding tax obligations on certain payments to nonresidents.

[Updated guidance on Petroleum Resource Rent Tax \(PRRT\) implements gas transfer pricing review recommendations](#)

The government released updated guidance on the PRRT that implements recommendations of the Treasury gas transfer pricing review.

[Senate committee report on public Country-by-Country \(CbC\) reporting bill](#)

The Senate Economics Legislation Committee issued its report on legislation that would introduce public CbC reporting in Australia.

India

[Amendments to direct tax measures proposed in finance bill 2024](#)

The Finance Minister has proposed amendments to the direct tax measures in the Finance Bill, 2024.



[Subsidiary did not constitute agency Permanent Establishment \(PE\) under Japan treaty \(tribunal decision\)](#)

The Delhi bench of the Tribunal held that an Indian subsidiary did not constitute an agency PE of a nonresident enterprise under the India-Japan income tax treaty because the Indian subsidiary neither had the authority to conclude contracts nor secured orders in India for the nonresident taxpayer.

[Payments for bandwidth services not royalties taxable in India under the India-Singapore treaty](#)

The Delhi High Court held that an expansion of the term “royalty” under domestic tax law occurring after the India-Singapore income tax treaty was entered into cannot be incorporated into or otherwise affect the interpretation of that term under the treaty in a manner that clearly broadens the scope of taxation under the treaty.

[India Tax Konnect](#)

KPMG in India prepared a report on the direct and indirect tax updates.

Korea

[Further proposed amendments to Pillar Two rules](#)

The Ministry of Economy and Finance in July 2024, announced further proposed amendments to the Korean Pillar Two global anti-base erosion minimum tax rules.

Malaysia

[New versions of electronic invoicing technical guidelines](#)

The Inland Revenue Board of Malaysia in July 2024, released updated versions of the guidelines for implementing the electronic invoicing mandate in Malaysia.

Singapore

[Updated Common Reporting Standard \(CRS\) “Frequently Asked Questions” \(FAQs\)](#)

The Inland Revenue Authority of Singapore in July 2024, issued an updated version of the CRS FAQs, revising question F.9 under the “Reporting Obligations” section.



Calendar of events

Date	Event	Location
22 August 2024	Pillar Two in Practice - Successes and Setbacks	Singapore



Beyond Asia Pacific

[EU: Public consultation on template and formats for public country-by-country reports](#)

The European Commission in August 2024, launched a public consultation on a common template and electronic formats for the public country-by-country reports.

[Ghana: Measures related to tax administration, digital solutions, indirect tax in 2024 mid-year budget review](#)

The Minister of Finance in July 2024, presented the 2024 mid-year budget review to parliament.



TaxNewsFlash by region

[Africa](#)

[Americas](#)

[Europe](#)

[United States](#)



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Tax Disputes and Controversy



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