



KPMG Asia Pacific Tax Weekly

KPMG Asia Pacific Tax Centre | 27 June 2019



Asia Pacific Tax Developments

Australia

[2019 International dealings schedule disclosures for hybrid mismatches](#)

The 2019 International dealings schedule (IDS) includes a number of questions in section G to capture information relating to the new hybrid mismatch rules as well as a number of new questions in section C seeking further information relating to interests in foreign entities.

[Updates to CRS reporting guide](#)

The Australian Taxation Office (ATO) issued updates to the common reporting standard (CRS) reporting page and to the CRS user guide “small reporter tool.”

India

[CBDT issues revised guidelines for compounding of offences under the Income-tax Act](#)

The Central Board of Direct Taxes (CBDT) issued a letter whereby revised guidelines for compounding of offences have been issued under the Income-tax Act, 1961 (the Act). The new guidelines shall come into effect from 17 June 2019 and shall be applicable to all applications for compounding received on or after the aforesaid date.

[GST Council Update – Annual Return filing date extended](#)

The GST council in its meeting held on 21 June 2019, has announced extension in the date of filing of annual return, stringent norms for tax evasion, simplification of registration process and also announced transition plan for the previously announced simplified GST return forms.

[Non-compete fees are eligible for depreciation under the Income-tax Act](#)

The Bombay High Court while dealing with the issue of allowability of depreciation under Section 32 of the Income-tax Act, 1961 on non-compete fees relied on the Gujarat Court decision in the case of Ferromatice Milacron India (P.) and held that depreciation is allowable on non-compete fees.

[Treatment of non-compete fees, executive search fees](#)

The KPMG member firm in India has prepared reports about the following tax developments:

- Non-compete fees are eligible for depreciation
- Fees for executive search not taxable as “fees for technical services” or royalty under the India-Netherlands income tax treaty
- Step-down subsidiary of listed company
- Proposed amendments with respect to audit of accounts of trust or institution

Japan

[Passage of the proposal for the amended business tax rates](#)

The proposal for the amended Tokyo business tax rates applicable for fiscal years beginning on or after 1 October 2019 was passed by the Assembly on 19 June 2019.



Beyond Asia Pacific

[Costa Rica: VAT exemption for construction services](#)

The tax administration has granted a general exemption from value added tax (VAT) until 30 June 2020 for certain construction-related services.

[Malta: Tax consolidation rules, formation of tax groups](#)

Fiscal unity rules allow related Maltese and foreign companies to form a tax consolidated group for Maltese income tax purposes.



TaxNewsFlash by region

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

[Africa](#)

[Americas](#)

[Europe](#)

[United States](#)

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