

KPMG Asia Pacific Tax Weekly

KPMG Asia Pacific Tax Centre | 17 October 2024



Asia Pacific Tax Developments

Australia

[Guidance on compliance approach to restructuring transactions in response to new thin capitalization rules](#)

The Australian Taxation Office (ATO) issued draft guidance setting out the ATO's compliance approach to reviewing restructuring transactions in response to the new thin capitalization introduced.

[Legislation implementing UK to Trans-Pacific Partnership passed by Parliament](#)

Legislation implementing the protocol to admit the United Kingdom to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership was passed by Parliament with no amendments.

[Draft legislation on small business tax obligations, foreign residents' capital gains withholding passes lower house of Parliament](#)

Draft legislation to reduce tax obligations for small businesses, and increase withholding on foreign residents' capital gains from 12.5% to 15%, passed the House of Representatives.

[Revised Fringe Benefits Tax \(FBT\) exemptions for plug-in hybrid vehicles \(PHEVs\) effective April 2025](#)

The ATO released updated guidance providing that as of 1 April 2025, PHEVs will no longer qualify as zero or low emissions vehicles for purposes of FBT exemptions.

India

[Amendments to Goods and Services Tax \(GST\) Rules including amnesty](#)

The Central Board of Indirect Taxes has issued the Central Goods and Services Tax (Second Amendment) Rules, 2024, which amend the CGST Rules 2017.

[Employees' Provident Fund Organisation \(EPFO\) issues circular on utilization of reserves and surplus for exempted Provident Fund trusts](#)

EPFO has issued a circular addressing the utilization of reserves and surplus for crediting interest to Trust beneficiaries.

[Indian Government rolls out Prime Minister's Internship scheme](#)

The Indian government launched the pilot phase of the ambitious Prime Minister's Internship Scheme, which aims to provide 1.25 lakh internship opportunities during the fiscal year 2024-25.

Malaysia

[Petrol subsidy cuts, new taxes and wage increases to be focus of Malaysia's 2025 Budget: Analysts](#)

Soh Lian Seng, Head of Tax at KPMG in Malaysia, gave his perspective on potential new taxes to be introduced in Budget 2025.

[Budget 2025: Experts want growth, fiscal balance](#)

Soh Lian Seng, Head of Tax at KPMG in Malaysia, shared his views on tax incentives for the upcoming 2025 Budget.

[Budget 2025: The case for a multi-year tax framework](#)

Soh Lian Seng, Head of Tax at KPMG in Malaysia, shared his insights on Budget 2025 and the multi-layer tax framework, emphasizing the need for clear tax policies over a fixed period to enhance investment certainty.

[Capital Gains Tax – Exemption for group restructuring and initial public offering](#)

Further to the 2024 Budget proposal, the statutory orders that provide exemption on chargeable income from gains arising from the disposal of unlisted shares of a company incorporated in Malaysia under a scheme for restructuring of companies in the same group or for initial public offering, have been gazetted.



Calendar of events

Date	Event	Location
22 October 2024	Tax Odyssey: Shaping the Future of Tax for the Financial Services and Insurance Sector (For queries, contact events@kpmg.com.sg)	Singapore
23 October 2024	Evolving Landscape: Tax Incentive and Industry Updates for Singapore Fund Managers (For queries, contact events@kpmg.com.sg)	Singapore
28 October 2024	Incentives in a Post-BEPS 2.0 World: Updates and Strategies for 2025 and Beyond (For queries, contact events@kpmg.com.sg)	Singapore
30 October 2024	KPMG 2024 Tax Audit and TP Insights Workshop for Thai Business in Cambodia (For queries, contact Ms. Sim Somanita and Ms. Van Leakhana)	Cambodia
5 November 2024	KPMG Compliance Seminar (For queries, contact Ms. Sim Somanita and Ms. Van Leakhana)	Cambodia
6 November – 19 November 2024	Tax and Business Summit 2024 (For queries, contact taxevents@kpmg.com.my)	Malaysia



Significant International Tax Developments

[OECD: BEPS Actions 5 and 14 peer reviews](#)

The Organisation for Economic Cooperation and Development (OECD) announced a second round of Base Erosion Profit Shifting (BEPS) Action 5 peer reviews and release of the first two batches of BEPS Action 14 peer reviews under the simplified Mutual Agreement Procedure (MAP) review process.



Beyond Asia Pacific

[Bulgaria: Public consultation on proposed amendments to Pillar Two rules](#)

The Ministry of Finance launched a public consultation on draft legislation amending the Pillar Two rules that were enacted in December 2023.

[Dominican Republic: Tax reform bill presented to Congress](#)

The Executive Branch on October 8, 2024, introduced a comprehensive “fiscal modernization law” to the National Congress. The proposed reforms encompass a wide range of changes across various tax categories, including income tax, value added tax (VAT), excise tax, and special tax regimes.



TaxNewsFlash by region

[Africa](#)

[Americas](#)

[Europe](#)

[United States](#)



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Tax Disputes and Controversy



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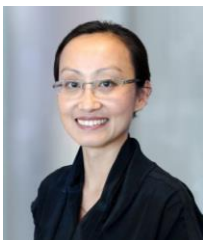
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