

KPMG Asia Pacific Tax Weekly

18 February 2025



Asia Pacific Tax Developments

Australia

[Hydrogen, critical minerals production tax incentives bill passes Parliament](#)

The Future Made in Australia Bill 2024 passed the Senate with amendments, which were then approved by the House of Representatives, enabling the legislation to pass Parliament in February 2025.

[Instructions for Reportable Tax Position \(RTP\) schedule for 2025](#)

The Australian Taxation Office released its instructions for the RTP schedule for 2025.

India

[Limitations on deductibility of head office expenses inapplicable under UAE treaty](#)

The Mumbai Special Bench of the Tribunal held that the limitations provided under the Income-tax Act, 1961 on the deductibility of head office expenses, which were allocated to an Indian branch of a UAE company that constituted a Permanent Establishment (PE), were inapplicable for purposes of computing the taxable profits of the PE under the India-UAE income tax treaty.

Malaysia

[Tax developments summary \(February 2025\)](#)

KPMG in Malaysia has prepared its monthly report for February 2025, covering the income tax, stamp duty, indirect tax, and electronic invoicing developments.

Philippines

[Guidance on excise tax exemption for electric vehicles, tax treatment of securitization transactions](#)

The Department of Finance issued Revenue Regulations No. 1-2025 amending section 9 (E) of RR No. 25-2003 relating to the documentary requirements to be submitted by a motor vehicle manufacturer/assembler/importer in order to determine whether the automobiles subject to excise tax exemption are hybrid or purely electric vehicles.

[A look back: A company's claim for input Value Added Tax](#)

Section 110(A) of the Tax Code, as amended, provides the transactions creditable against output tax.



Significant International Tax Developments

[OECD: Public consultation on tax incentives](#)

The Platform for Collaboration on Tax in December 2024 released a public consultation draft titled "Tax Incentives Principles".

[OECD: Preferential tax regimes under BEPS Action 5](#)

The OECD released the latest peer review results on preferential tax regimes under BEPS Action 5.



Calendar of events

Date	Event	Location
27 February 2025	2025 Tax Institute (For queries, contact leakhananan@kpmg.com.kh , lylymao@kpmg.com.kh and ychea@kpmg.com.kh)	Phnom Penh, Cambodia
4 March 2025	Transfer Pricing 2024 – Evolution or revolution? (For queries, contact events@kpmg.com.my)	Virtual
5 March 2025	Unraveling profiteering: How unreasonably high profits are determined (For queries, contact taxevents@kpmg.com.my)	Malaysia
14 March 2025	KPMG Singapore Budget 2025 Seminar (For queries, contact events@kpmg.com.sg)	Singapore



Beyond Asia Pacific

[Colombia: Reporting obligations for digital platform operators implemented](#)

The Directorate of Taxes and Customs issued Resolution 199 of 2024 creating the obligation to report information by digital platform operators.

[France: Tax measures in Finance Act 2025](#)

The French Finance Act for 2025 was adopted by the Parliament in February 2025 and will become formally enacted after publication in the official gazette.



TaxNewsFlash by region

[Africa](#)

[Americas](#)

[Europe](#)

[United States](#)



KPMG Asia Pacific Tax Centre Contacts

Asia Pacific Regional Leader, Tax & Legal



Lewis Lu
Head of Tax & Legal
KPMG Asia Pacific
E : lewis.lu@kpmg.com

Asia Pacific Chief Operating Officer, Tax & Legal



Byran Theunisen
Chief Operating Officer - Tax & Legal
KPMG Asia Pacific
E : btheunisen1@kpmg.com.sg

Service Line Specialists

M&A Tax



Matt Ervin
Partner, KPMG Australia
E : mattervin@kpmg.com.au

Indirect Tax Services



Kenneth Leung
Partner, KPMG China
E : ky.leung@kpmg.com

Global Mobility Services



Murray Sarelius
Partner, KPMG in Singapore
E : murraysarelius1@kpmg.com.sg

International Tax



Sunny Leung
Partner, KPMG China
E : sunny.leung@kpmg.com



KPMG Asia Pacific Tax Centre Contacts

Tax Reimagined, including Global Compliance Management Services and Financial Services



John Timpany
Partner, KPMG China
E : john.timpany@kpmg.com

Legal Services



Hanim Hamzah
Executive Director, KPMG in Singapore
E : hanimhamzah@kpmg.com.sg

Transfer Pricing Services



Tony Gorgas
Partner, KPMG Australia
E : tgorgas@kpmg.com.au

Tax Policy



Conrad Turley
Partner, KPMG China
E : conrad.turley@kpmg.com

ESG



Pauline Koh
Partner, KPMG in Singapore
E : paulinekoh@kpmg.com.sg

Tax Disputes and Controversy



Xiaoyue Wang
Partner, KPMG China
E : xiaoyue.wang@kpmg.com



KPMG Asia Pacific Tax Centre Contacts

Asia Market Sector Specialists

Asset Management



Darren Bowdern
Partner, KPMG China
E : darren.bowdern@kpmg.com

Banking



John Timpany
Partner, KPMG China
E : john.timpany@kpmg.com

Energy & Natural Resources



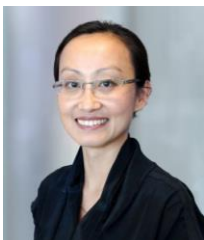
Gabby Burcul
Partner, KPMG Australia
E : gabbyburcul@kpmg.com.au

Insurance



John Salvaris
Partner, KPMG Australia
E : jsalvaris@kpmg.com.au

Sovereign Wealth and Pension Funds



Minh Dao
Partner, KPMG Australia
E : mdao@kpmg.com.au

R&D and Tax Incentives



Bo Han Lee
Partner, KPMG in Singapore
E : bohanlee@kpmg.com.sg



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