



Asia Pacific Tax Developments

Australia

Australia: Federal budget scheduled for 12 May

Australia's federal budget is scheduled to be delivered 12 May 2015.

KPMG in Australia has prepared a report that sets the scene for what tax items may be featured in the budget, and comments on what measures are expected.

[More details](#)

Australia: Building confidence – ATO reveals key compliance focus

The ATO recently released its *Building Confidence paper*, which provides a snapshot of the ATO's strategic approach, results and compliance activities.

The publication expresses the need for fairness in the tax and super systems. It is a reminder of the key areas of focus for the ATO, the importance of robust supporting documentation, and to seek advice on application of the law when there is uncertainty.

[More details](#)

Australia: Northern Territory Budget Stamp Duty measures

The Northern Territory 2015-2016 Budget Measures were released on 28 April 2015, and included a number of notable stamp duty measures. KPMG in Australia comments on the upcoming changes.

[More details](#)

Australia: ASEAN-Australia-New Zealand rules of origin

The Australian customs authority has released regulations providing the customs rules of origin under the agreement establishing the ASEAN-Australia-New Zealand free trade area.

[More details](#)

Hong Kong SAR

Hong Kong: Capital markets update

KPMG in Hong Kong have produced a capital markets update, providing a snapshot of the latest regulatory reporting and compliance matters affecting the Hong Kong capital markets.

[More details](#)

India

India: Delhi High Court declines to examine the taxpayer's claim for grant of tax holiday benefit

The Delhi High Court in case of HCL Technologies declined to examine the taxpayer's claim for grant of tax holiday benefit on the basis of factual findings by lower authorities. KPMG in India comments on the findings.

[More details](#)

India: Discount given by a distributor to dealers and retailers for postpaid and prepaid connections is commission

The Income-tax Appellate Tribunal has held that a discount or incentive given by a distributor to dealers or retailers for post-paid or prepaid connections is commission. Therefore, such commission is subject to withholding of tax. KPMG in India comments on the case.

[More details](#)

India: Profit methods may not be the most appropriate method for intra-group services

The Income-tax Appellate Tribunal has held that, in the case of payments for intergroup services related to technical and management costs, where the expense transactions have no mark up, the profit methods may not be the most appropriate method for transfer pricing documentation.

[More details](#)

India: Proposed amendments to the Finance Bill, 2015

The Finance Bill, 2015 was introduced in late February. The amendments to the Bill have been recently tabled by notice of amendments.

KPMG summarises the key amendments in this report.

[More details](#)

Indonesia

Indonesia: APA guidelines

Indonesia's Minister of Finance has issued guidelines regarding the procedures for establishing and executing an Advance Pricing Agreement (APA). KPMG in Indonesia have produced a report outlining the regulations.

[More details](#)

Indonesia: Tax audits of companies, more anticipated

The Director of General Taxes has issued confirmation of the budget revenue goals for fiscal year 2015. In order to meet these budgetary goals, a separate circular was issued, stating the tax administration's strategies for tax collections via tax audits in 2015.

[More details](#)

Calendar of Events

Date	Event	Location
12 May	Australian Federal Budget announcement More details	Australia
21 May 2015	New Zealand Budget announcement	New Zealand

Beyond Asia Pacific

Germany - Amendments to tax treaty with France

A supplemental agreement to the Germany-France income tax treaty, pending ratification and its entry into force, will result in a number of amended provisions, including those regarding tax treatment of gains on sale of property, taxation of certain dividends, cross-border state pensions, retirement benefits, and similar payments.

[More details](#)

Italy - Pending transfer pricing, international tax reform proposals

A draft legislative decree, currently pending consideration by the Italian parliamentary commissions, would allow companies with international operations to enter into five-year binding agreements with the Italian tax administration concerning the treatment of certain cross-border issues.

[More details](#)

United Kingdom: Diverted profits tax, tax authorities share information

The UK Government has announced that HM Revenue and Customs (HMRC) will be working with five other tax authorities to share information about how digital multinationals might be shifting their profits to tax havens.

[More details](#)

TaxNewsFlash by Region

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

[Africa](#)

[Americas](#)

[Europe](#)

[United States](#)

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