



JAPAN

On March 29, 2016, Japan's National Diet (legislature) enacted the 2016 Tax Reform Bill that introduces the three-tiered documentation requirements in the OECD BEPS Action 13 recommendations. The amendments will require annual preparation and filing of a master file and CbC report by the "ultimate parent company" of an MNE group. Existing local tax requirements in Article 22-100 of the Corporation Tax Enforcement of the Act on Special Measures Concerning Taxation of Japan ("SMTA Ministerial Order") are amended to include additional reporting items to align with the BEPS Action 13 recommendations.

The CbC report will contain certain information about the MNE group in the same format as Annex B of the BEPS Action 13 recommendations. Filing of the report will be required in Japan for taxpayers belonging to an MNE group that has consolidated revenues of JPY 100 billion or more in the preceding fiscal year. The report will be required for Japanese parent companies or any Japanese subsidiaries or branches of foreign MNEs for fiscal years beginning on or after April 1, 2016. The submission deadline will be one year following the close of the ultimate parent company's fiscal year to which CbCR relates.

The master file will contain the same general information as in the BEPS Action 13 recommendations for taxpayers belonging to an MNE group with consolidated revenues of JPY 100 billion or more in the preceding fiscal year. However, unlike the CbCR, Japanese subsidiaries or branches of foreign MNEs will have to file the master file with the Japanese tax authorities, not would not otherwise obtain the information through exchange of information provisions in Japanese tax treaties.

Because the local tax amendments include a contemporaneous preparation requirement, they will be effective for fiscal years beginning on or after April 1, 2017 (as opposed to the April 1, 2016, effective date for CbCR and master file requirements).



Luxembourg

Luxembourg has indicated that it is necessary to push for appropriate transfer pricing documentation and a CbCR template as part of its participation in the OECD BEPS project. On December 15, 2015, the Minister of Finance used at a conference that Luxembourg is open to the idea of public CbCR, but that private tax rulings would remain private.



Malaysia

On March 24, 2016, the Malaysian tax authorities (Inland Revenue Board) said during a consultation that the government intends to amend existing master and local tax requirements and to introduce CbCR around the middle of 2016 that would likely apply from January 1, 2017. Malaysia was among the 30 countries that signed the MCAAA on January 27, 2016.

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