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GLOBAL INDIRECT TAX SERVICES

Asia Pacific Indirect Tax Country Guide

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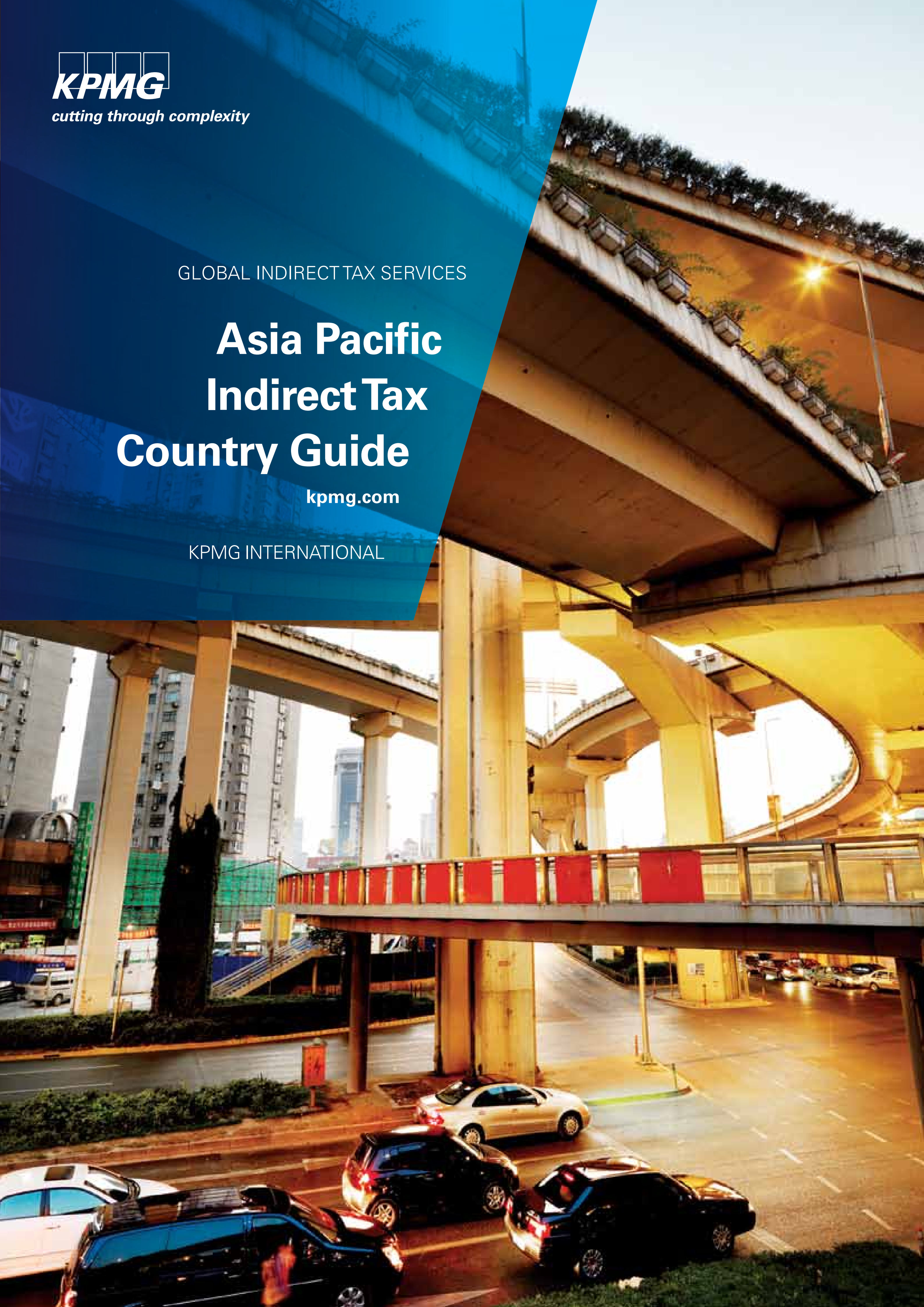

Given the volume of VAT/GST transactions that must be handled at any one time, finance and tax directors in Asia Pacific should make sure their organisation's people, systems and processes are able to predict and respond to the VAT/GST changes that will impact their operations and internal systems as a result of changes in law, policy and practice.

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Asia Pacific indirect taxes on the rise:

Around the world, the shift to indirect tax continues – with corporate tax rates falling and value added tax and goods and services tax (VAT/GST) systems increasing in importance.

The latest KPMG International Corporate and Indirect Tax Rate Survey confirms the continuing increase in indirect tax rates and a broadening of the indirect tax base, particularly in mature tax jurisdictions. For the Asia Pacific region, the trend is perhaps more pronounced, with countries such as China, India and Malaysia looking to substitute narrow or inefficient forms of indirect taxes with new broad based VAT/GST regimes.

As the long term global trend towards increased indirect taxation is likely to continue and significantly influence tax policy in Asia Pacific in the coming years, businesses operating in the region need to ensure that they have the right mix of corporate income tax and VAT/GST management resources in place.

Factors driving the global shift toward lower corporate income tax rates and either new VAT/GST regimes or higher VAT/GST rates include:

- Most countries need to attract and retain foreign investment to grow. In order to attract investors, many countries have opted to follow the global trend and compete through lower direct income taxes, while making up the reduced revenues through higher indirect taxes.
- Indirect taxes can be simpler to administer than direct taxes, reducing collection costs and enforcement efforts, and they can produce more real-time cash collections for tax authorities than many other taxes.
- As their tax systems mature, many countries will opt for more streamlined, stable, sustainable sources of tax revenue—less susceptible to changes in economic circumstances. Indirect taxes, which effectively tax domestic consumption which is relatively stable and not as mobile as corporate profits, are very powerful in this regard.

Of course, in a diverse region such as Asia Pacific, it can be difficult to generalise; however, as countries in the region take steps to promote economic development and investment, or to counter the global economic downturn, the challenge for both governments and business alike is to ensure that their indirect tax regimes serve to further enhance the international competitiveness of the region.

As the global shift towards indirect taxation continues, Asia Pacific businesses with international operations will encounter more challenges in achieving full compliance and more pressure on their resources and cash flow. Despite this pressure, these companies need to achieve a difficult balance between managing their indirect tax risks and creating value locally and globally.

Through our work with leading organisations worldwide, including the KPMG Benchmark Survey on VAT/GST, KPMG International has developed a framework for delivering effective and efficient VAT/GST performance. The Driving Indirect Tax Performance framework outlines how companies can develop a set of clear, commonly understood policies and practices designed to manage VAT/GST risk while maximising value creation.

Given the huge volumes of VAT/GST transactions that must be handled at any one time, finance and tax managers in Asia Pacific should make sure their organisation's people, systems and processes are able to predict and respond to the VAT/GST changes that will impact their operations and internal systems as a result of changes in law, policy and practice.

Those businesses which have developed and implemented an indirect tax management strategy in the region will be best placed to benefit from improved cash flow, reduced VAT/GST-related costs, better business process performance and enhanced profits.

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Asia Pacific indirect tax overview

	Type of indirect tax (VAT/GST/Other)	Standard VAT/ GST rate	Reduced rates, zero rates or exemptions	Voluntary VAT/ GST registration possible for an overseas company?	Does an overseas company need to appoint a fiscal representative?
Australia	GST	10 %	GST-free (zero-rated) supplies Input taxed (exempt) supplies	Yes	No
Cambodia	VAT	10%	Zero-rated supplies Exempt supplies	No	No
China	VAT Business Tax Consumption Tax	VAT – 17% Business Tax – 3% - 5% Consumption Tax – various	Reduced rate of 13 percent Zero-rated supplies Exempt supplies	No	No
Fiji Islands	VAT	15%	Zero-rated supplies Exempt supplies	No	No
India	VAT/ Central Sales Tax (CST) Service Tax	VAT – 4% - 15% / CST – 2% Service Tax – 10.3%	Reduced rates Zero-rated supplies Exempt supplies	Yes	Yes
Indonesia	VAT	10%	Reduced rate of 5 percent Zero-rated supplies Exempt supplies	No	No
Japan	Consumption Tax	5%	Zero-rated supplies Exempt supplies	Yes	Yes
Laos	VAT	10%	Zero-rated supplies Exempt supplies	No	No
Malaysia	Sales Tax Service Tax	Sales Tax – 10% Service Tax – 6%	Reduced rate (Sales Tax) Exempt supplies (Sales Tax)	No	No
New Zealand	GST`	15%	Reduced rates Zero-rated supplies Exempt supplies	Yes	No
Papua New Guinea	GST	10%	Zero-rated supplies Exempt supplies	Yes	Yes
Philippines	VAT	12%	Zero-rated supplies Exempt supplies	No	No
Singapore	GST	7%	Zero-rated supplies Exempt supplies	Yes	Yes
South Korea	VAT	10%	Zero-rated supplies Exempt supplies	Yes	No
Sri Lanka	VAT	12%	Zero-rated supplies Exempt supplies	Yes	Yes
Taiwan	VAT Gross Business Receipts Tax (GBRT)	VAT – 5% GBRT – various	Zero-rated supplies Exempt supplies	No	No
Thailand	VAT	7%	Zero-rated supplies Exempt supplies	Yes	Yes
Vietnam	VAT	10%	Reduced rates of 0 percent and 5 percent Exempt supplies	Yes	Yes

	VAT/GST grouping possible?	How frequently are VAT/GST returns submitted?	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	Is a business required to issue tax invoices (or other special invoices for indirect tax purposes)?	Is it possible to issue invoices electronically?	Is it possible to issue recipient/buyer created tax invoices?	Does a reverse charge mechanism on imported services apply?
	Yes	Monthly, quarterly, annually	No	Yes (if requested)	Yes	Yes	Yes
	No	Monthly	No	Yes (to VAT registered buyers)	No	No	No
	No	Daily, three daily, five daily, ten daily, fifteen daily, monthly, quarterly	No	Yes	Yes	No	No
	No	Monthly, quarterly	No	Yes	No	Yes	Yes
	No	VAT/CST return – monthly/ quarterly/ every six months depending on the state involved Service Tax return – every six months	No	Yes	No	No	VAT – No Service Tax – Yes
	No	Monthly	No	Yes	No	No	No
	No	Monthly, quarterly, annually	No	No	Yes	Yes	No
	No	Monthly	No	Yes	No	No	Yes
	No	Every two months	No	Yes	Yes	No	No
	Yes	Monthly, every two months, every six months	No	Yes (if requested)	Yes	Yes	Yes
	Yes	Monthly	No	Yes	Yes	Yes	Yes
	No	Monthly, quarterly	No	Yes	Yes	No	No
	Yes	Quarterly. Monthly or every six months may be permitted.	No	Yes	Yes	Yes	Yes (but not applied in practice)
	No	Quarterly	No	Yes	Yes	Yes	Yes
	No	Monthly, quarterly	No	Yes	No	No	No
	Yes	Every two months	Possible in specific instances	Yes	Yes	No	Yes
	No	Monthly	No	Yes	Yes	No	Yes
	No	Monthly	No	Yes	Yes	Yes	Yes

Australia

General	Types of indirect taxes (VAT/GST and other indirect taxes)	GST
	What is the standard VAT/GST rate?	10 percent
	Are there any reduced rates, zero-rates or exemptions?	There are no reduced rates. Some supplies are not taxable supplies; they may be either GST-free (zero-rated) or input taxed (exempt).[1] GST-free supplies include: • some food products • most medical and health services, drugs, medical aids and appliances • most education courses • child care • exports • religious services • water, sewerage, and drainage services • international transport. Input taxed supplies include: • financial supplies • residential rent • residential premises • fund-raising events conducted by charitable institutions.
Registration	Who is required to register for VAT/GST?	An entity that is carrying on an enterprise and whose current or projected annual turnover is AUD75,000 or more (exclusive of GST) is required to be registered. Non-profit bodies are not required to be registered unless their current or projected annual turnover is AUD150,000 or more (exclusive of GST). Taxi operators are required to be registered regardless of their annual turnover.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	Yes. A non-resident entity that is carrying on an enterprise, whether in or outside of Australia and whose current or projected annual turnover is below the relevant GST registration threshold, may voluntarily register for GST. This is typically only done where an entity wishes to recover input GST on purchases it makes.
	Does an overseas company need to appoint a fiscal representative?	No, however, in practice the bank account to which any GST refund is made must be domiciled in Australia, subject to limited exceptions.
	Is VAT/GST grouping (*) possible?	Yes, provided various criteria are met.

1 For a GST-free supply, no GST is levied on the supply, but the supplier (if registered) is entitled to input tax credits (ITCs) for the GST incurred on acquisitions or purchases relating to that supply.

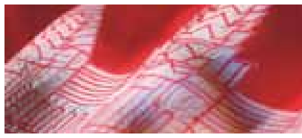
For an input taxed supply, there is similarly no GST levied on the supply, however, the supplier will not be entitled to claim full ITCs for the GST incurred on acquisitions which relate to that supply.

* by ‘grouping’ we mean: either a consolidation mechanism between taxpayers belonging to the same group (payment and refund are compensated but taxpayers remain distinct) or a fiscal unity for VAT/GST purposes (several taxpayers are regarded as a single taxpayer)

Compliance	How frequently are VAT/GST returns submitted?	GST returns are lodged either on a monthly, quarterly, or in certain limited situations, annual basis. Electronic monthly lodgement is compulsory if an entity's annual turnover is AUD20 million or more.
	What are the exchange rate rules in your country?	For tax invoice requirements, any payment made in a foreign currency for a supply must be converted into Australian currency using the daily exchange rate: • set by the Reserve Bank of Australia • set by a foreign exchange organisation (e.g. a commercial bank), or • agreed between the parties.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.
Invoices	Is a business required to issue tax invoices?	Yes, if requested to do so by the recipient.
	Is it possible / mandatory to issue invoices electronically?	Yes. It is possible (but not mandatory) to issue tax invoices electronically. Electronic tax invoices must be capable of being downloaded or printed in a readable format and must contain all the details of a tax invoice in the approved form.
	Is it possible to issue recipient created tax invoices ("self-invoicing")?	Yes, subject to meeting certain requirements. These are referred to as recipient created tax invoices (RCTI).
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	The Australian Taxation Office (ATO) conducts GST reviews and audits on a regular basis and there is no specific measure of its regularity. The focus of the ATO's compliance activities is outlined on an annual basis in its Compliance Program.
	Are there audits done electronically in your country (E-Audit)?	Yes. The ATO uses third-party data and data modeling techniques in carrying out its compliance activities.
	What penalties can arise from non-compliance?	Administrative penalties and general interest charges ("GIC") may be imposed as a consequence of non-compliance.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	Yes, these include: • for taxable supplies of real property, the supplier may calculate the GST as 1/11th of the "margin" • reduced input tax credits (75 percent) for certain acquisitions that are related to making input taxed financial supplies • GST registration of non-resident companies to claim back GST.
	Does a reverse charge mechanism apply?	Yes. A reverse charge mechanism applies: • where the non-resident agrees with a registered Australian recipient to reverse charge the GST liability on a taxable supply, or • automatically where a non-resident supplies things other than goods or real property to an Australian recipient who would not be entitled to full recovery of GST on costs.

Special indirect tax rules (continued)	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	No.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes. An entity may apply for a private binding ruling from the Australian Commissioner of Taxation. Informal rulings are not issued.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	Yes. GST public rulings are available at: http://law.ato.gov.au/atolaw/view.htm?locid=GST. Sanitised versions of private binding rulings are also available at: http://www.ato.gov.au/rba/search.aspx
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Wine Equalisation Tax • Luxury Car Tax • Fuel Tax • Customs duty • State taxes, including stamp duty.

Cambodia



General	Types of indirect taxes (VAT/GST and other indirect taxes)	VAT
	What is the standard VAT/GST rate?	10 percent
	Are there any reduced rates, zero rates or exemptions?	There are no reduced rates. A zero rate and exemptions apply as follows: A zero rate applies to taxable goods exported from the Kingdom of Cambodia, taxable services rendered outside the Kingdom of Cambodia and on certain charges in relation to international transportation of people and goods. Exempt supplies include: • public postal service • hospital, clinic, medical, and dental services and the sale of medical and dental goods incidental to the performance of such services • transportation of passengers by a wholly state owned public transportation system • insurance services • primary financial services • the importation of articles for personal use that are exempted from customs duties • non-profit activities in the public interest recognised by the Ministry of Economy and Finance.
Registration	Who is required to register for VAT/GST?	An enterprise which is making taxable supplies of goods and services is required to register for VAT if it falls under one of the following criteria: • all types of corporation, importer-exporter and investment enterprises • any other enterprise with turnover in respect of goods sold exceeding KHR125 million for the preceding three consecutive months or in the next three consecutive months • any other enterprise with turnover in respect of services provided exceeding KHR60 million for the preceding three consecutive months or in the next three consecutive months • any enterprise which, at the beginning of any three consecutive months, has any government contracts which will produce taxable turnover exceeding KHR30 million.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	No. From a practical point of view, this is not possible.
	Does an overseas company need to appoint a fiscal representative?	N/A.
	Is VAT/GST grouping possible?	No.

Compliance	How frequently are VAT/GST returns submitted?	VAT returns are required to be lodged and VAT paid on a monthly basis, on or before the 20th day of the following month.
	What are the exchange rate rules in your country?	The National Bank of Cambodia publishes rates. The Tax Authority uses these rates to calculate average exchange rates for the month which taxpayers can apply when converting foreign currency balances for VAT filing purposes.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No. An overseas company cannot recover VAT if it is not registered for VAT.
Invoices	Is a business required to issue tax invoices?	A VAT registered person must issue a tax invoice to its VAT registered buyer; however, a VAT registered person cannot issue a tax invoice to a non-VAT registered buyer.
	Is it possible / mandatory to issue invoices electronically?	No. The VAT law does not cover the issuance of invoices electronically.
	Is it possible to issue recipient created tax invoices?	No.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Yes. Any VAT refund will be subject to tax audit and VAT is included in tax audit process.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	No.
	What penalties can arise from non-compliance	Culpability penalty at 10 percent, 25 percent or 40 percent. Interest penalty at 2 percent from due date.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	No.
	Does a reverse charge mechanism apply?	No.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	No.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	No formal process exists.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	No formal process exists.
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Customs duty • Property tax • Tax on unused land • Stamp duty • Accommodation tax • Specific tax on certain merchandise and services • Tax on public lighting.

China

General	Types of indirect taxes (VAT/GST and other indirect taxes)	The types of indirect taxes include: VAT, Business Tax (BT) and Consumption Tax (CT). VAT applies to the sale and importation of goods and provision of repair, replacement and processing services in China. BT applies to the provision of other services, transfer of intangible assets and sale of immovable property in China. CT applies to the manufacturing, processing, importation or selling of 14 different kinds of goods in China, principally luxury goods.
	What is the standard VAT/GST rate?	VAT – 17 percent. BT – 3 percent to 5 percent, although the exception is entertainment services which can be as high as 20 percent. CT – varies depending on stage of production, type, weight or capacity. As CT is limited in its application, it is not discussed further below.
	Are there any reduced rates, zero rates or exemptions?	Yes. In relation to VAT, the following are main examples of exemptions and reduced rates: • A narrow range of goods is exempt from VAT, including agricultural products, contraceptive drugs and devices, antique books, and other items declared by the State Council as being exempt. • ‘Small scale taxpayers’, being those without sophisticated business, accounting and auditing systems, and whose turnover is below certain thresholds (ranging from RMB500,000 to RMB800,000 of annual turnover) pay VAT at the rate of 3 percent, but they are ineligible for input tax credits on purchases. • A reduced rate of 13 percent applies to the sale of food grains and vegetable oils, heating, air-conditioning, certain gas supplies, books, newspapers and magazines. • The main category of zero-rated goods is exports. However, unlike many other countries, the refund provided on zero-rated goods is, in most cases, less than the amount of VAT paid. In relation to BT, the main exemptions are for processing, repair and replacement services (because these are subject to VAT), services provided by employees to their employers, waste disposal services and other services which are specifically exempt (e.g. nursing services, medical services, educational services). Generally, BT applies to the turnover of a business, however, for certain types of transactions, tax is payable on the “margin”. For example, foreign currency trading.

Registration	Who is required to register for VAT/GST?	For VAT purposes, there are two separate concepts relevant here: thresholds for liability for VAT purposes, and the separate threshold for registering either as a "small scale taxpayer" (no input tax credits for purchases, but VAT liability on sales at 3 percent) or "general taxpayer" (input tax credits for purchases, but generally a 17 percent VAT liability on sales). The VAT thresholds for liability apply only to individuals. Businesses and other "units" automatically have VAT liabilities on their taxable transactions, irrespective of turnover. However, even for individuals, the thresholds are very low-ranging from RMB1,500 per month of sales, or RMB150 per transaction. The precise thresholds depend on the local tax jurisdiction. A small-scale taxpayer is: (1) a taxpayer who produces goods or provides taxable services, or a taxpayer who engages mainly in production of goods or provision of taxable services, and a taxpayer who engages in wholesale or retail activities, with an annual taxable turnover of not more than RMB500,000. (2) any taxpayer not already covered in (1) above, with an annual taxable turnover of not more than RMB800,000. Taxpayers who exceed these thresholds can apply to the tax authorities for certification as a general taxpayer. For BT purposes, there is a threshold beneath which no BT liability arises. For individuals, the threshold is set very low: RMB1,000 per day where tax is paid on a transaction basis, or RMB1,000 to RMB5,000 per month where tax is paid on a fixed period basis. For businesses and all other types of units, there is no minimum threshold.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	No; however, overseas companies may be able to register as "general taxpayers" for VAT purposes rather than "small scale taxpayers" where they do not otherwise meet the turnover thresholds described above, but have a permanent establishment in China and meet certain conditions.
	Does an overseas company need to appoint a fiscal representative?	No; however, where an overseas company or individual provides taxable services in China which are subject to BT or VAT, and it does not have any business establishments in China, its representative in China is the withholding agent. If the overseas company or individual does not have any representatives in China, the purchaser is the withholding agent.

Registration (continued)	Is VAT/GST grouping possible?	No. Grouping of different legal entities is not possible in China. Moreover, in many cases, different branches or offices of the same legal entity may be required to separately account for transactions, particularly where they operate in different provinces. Transactions between head office and a branch may even be subject to VAT or BT. Consolidated reporting (of a head office and its branches) requires approval. It is commonly given for merchandise retailers and gas station operators.
Compliance	How frequently are VAT/GST returns submitted?	VAT returns must be submitted every one day, three days, five days, 10 days, 15 days, monthly or quarterly, depending on the taxpayer's activities. Likewise, BT returns must be submitted every five days, 10 days, 15 days, month or quarter. Most taxpayers lodge either monthly or quarterly. Where a taxpayer's VAT period is monthly or quarterly, VAT has to be paid within 15 days following the end of the VAT period.
	What are the exchange rate rules in your country?	It is generally common practice that taxpayers in China convert any foreign exchange balances using the middle exchange rate published by the People's Bank of China either on the day the transaction is recognised for accounting purposes, or on the first day of the month in which the tax is paid on the transaction. Taxpayer's are not entitled to switch methods within the course of a year.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No. Only general taxpayers are eligible to claim input tax credits for VAT purposes, and they must be registered to do so. BT is a turnover tax and therefore there is no BT recovery mechanism. However, for some industries, BT operates on a 'net' basis.
Invoices	Is a business required to issue tax invoices?	Yes. Special VAT invoices may only be issued by general taxpayers, and even then, only through anti-counterfeit electronic systems. Those special VAT invoices must contain certain information to be valid.
	Is it possible / mandatory to issue invoices electronically?	Yes, but only via machines purchased from the tax authorities.
	Is it possible to issue recipient created tax invoices?	No.

Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Yes, audits take place regularly. They tend to be carried out in the form of annual tax inspections targeting specific industries or entities, self-inspections and random audits.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	No, E-audit are not generally used.
	What penalties can arise from non-compliance?	The penalty and interest regime in China is designed to have a strong deterrent effect. Interest charges on unpaid taxes apply at a daily rate of 0.05 percent (e.g. 18.25 percent per annum), as well as fixed dollar monetary fines; penalties ranging from 50 percent to 500 percent of the tax owed may be applied for evasion.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	Yes, there are a significant number of special indirect tax rules in China which differ from standard indirect tax rules. Many of these rules arise from the fact that the indirect tax system is often used as a means of carrying out the government's economic and trade policies.
	Does a reverse charge mechanism apply?	No.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Generally no, however, the government from time-to-time does introduce various exemptions or concessions with a limited time span. For example, an exemption from BT for certain outsourcing services for the period to 31 December 2013.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Generally no.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	N/A.
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Customs duty • Stamp duty • various local levies, such as the Urban Maintenance & Construction Tax and Education Levy • various real estate specific taxes, motor vehicle taxes and mining specific taxes.

Fiji

General	Type of indirect tax (VAT/GST)	VAT
	What is the standard VAT/GST rate?	15 percent
	Are there any reduced rates, zero rates or exemptions?	There are no reduced rates. Some supplies may be either exempt or zero-rated. VAT exempt supplies include: • financial services • residential rent • education by an educational institution • goods and services donated by a non-profit body. Zero-rated supplies include: • some basic food products • exports • water and sewerage services • international transport services • supply of medicines and drugs dispensed on the prescription of a medical practitioner • international inbound telecommunication services.
Registration	Who is required to register for VAT/GST?	Every person who carries on a taxable activity supplying goods (with annual turnover exceeding FJD50,000) or supplying services (annual turnover exceeding FJD50,000) is required to be registered. Produce suppliers and persons providing exempt supplies are not required to be registered.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	No, a non-resident entity (with turnover below the VAT registration threshold) may not be allowed to voluntarily register for VAT.
	Does an overseas company need to appoint a fiscal representative?	No; however, VAT refunds are deposited directly to the taxpayer's domestic bank account. Hence, the non-resident entity would need to have a local bank account if it is expecting VAT refunds.
	Is VAT/GST grouping possible?	No.
Compliance	How frequently are VAT/GST returns submitted?	Entities with annual turnover exceeding FJD100,000 are required to file monthly VAT returns. Entities with a turnover of less than FJD100,000 may file quarterly VAT returns.
	What are the exchange rate rules in your country?	For any business or employment income derived by a taxpayer in a country other than Fiji, that income must be expressed in Fiji currency (FJD) at a rate equal to the average exchange rates applicable from time-to-time during the year that income is derived. Any income other than business or employment income derived by a taxpayer in a country other than Fiji, that income and any tax paid in respect of that income must be expressed in FJD at the exchange rate as follows: • if all or part of the income remitted to Fiji – on the day it is remitted • in any other case – at the end of the relevant year of income.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.

Invoices	Is a business required to issue tax invoices?	All VAT registered entities must issue tax invoices for sales exceeding FJD10. However, if the recipient requests a tax invoice for supplies under FJD10, the supplier is obliged to provide one.
	Is it possible to issue invoices electronically?	There is currently no provision in the Fiji legislation to issue electronic invoices. However, there may be scope to have this agreed to by the Commissioner of Inland Revenue on a case by case basis.
	Is it possible to issue recipient created tax invoices?	Yes, but only with the prior approval of the Inland Revenue Service (IRS).
Audits	Do tax audits take place on a regular basis?	There are various mechanisms for the IRS to select an entity for audit, some of which are: • random selection • industry based audits • where an entity has frequent refund cases.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	The IRS has not yet adopted E-Audit in Fiji.
	What penalties can arise from non-compliance?	Administrative penalties are as follows: • failure to lodge return – 20 percent of VAT payable as per the return or FJD1 per day in other cases • failure to pay tax by the due date – 25 percent of the unpaid tax • failure to maintain proper records – 75 percent of the amount of tax payable for the period to which the failure relates • penalty for making false or misleading statement – 75 percent of the tax shortfall if the statement was made knowingly or recklessly, and 20 percent in any other case • penalty for making false statement is increased by 10 percentage points for second such offence and by 25 percentage points for third or subsequent offence.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	No.
	Does a reverse charge mechanism apply?	Yes.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	No.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	The tax legislation has provision for tax rulings but this has not been implemented.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	There are no rulings available to the public yet. However, the IRS has issued some Practice Statements which are available on their website: www.frca.org.fj

Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Gambling turnover tax • Hotel turnover tax • Stamp duty • Customs duty • Capital Gains Tax (effective 1 May 2011).

India

General	Types of indirect taxes (VAT/GST and other indirect taxes)	• VAT/Central Sales Tax ('CST') on local/ interstate sale of goods in India • Service tax – on supply of specified services in India[1] • Excise duty – on manufacture/production of goods in India • a federal GST is proposed to be introduced in October 2012 (tentative).
	What is the standard VAT/GST rate?	• VAT – ranges between 4 percent to 15 percent/CST – 2 percent • Service tax – 10.3 percent • Excise duty – 10.3 percent.
	Are there any reduced rates, zero rates or exemptions?	• Reduced rates are applicable to the sale of specified goods, e.g. industrial inputs, software. • Exemption ('nil' rate) is applicable to the sale of specified goods such as vegetables, books and specified services such as road building and bridges. • Export of goods and services are zero-rated. • Input tax credit (set off) is available for VAT paid against VAT/CST liability in the same state. Input tax credit is also available for Service tax, Excise duty and a specified component of customs duty against Service tax/excise duty liability, subject to certain prescribed conditions.
Registration	Who is required to register for VAT/GST?	Generally, any person selling goods/providing services/ manufacturing goods beyond the specified threshold (VAT – approx INR500,000[2] ; CST – nil; Service tax – INR900,000 and Excise duty – INR15,000,000) is liable to register.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	Yes. Overseas companies can generally register voluntarily through an agent in India (fiscal representative), see below for further details.
	Does an overseas company need to appoint a fiscal representative?	Generally, yes.
	Is VAT/GST grouping possible?	No.
Compliance	How frequently are VAT/GST returns submitted?	• VAT/CST return – monthly/quarterly/half-yearly depending on the state involved. • Service tax return – half-yearly. • Excise duty return - monthly/quarterly/annually depending upon factors such as nature of product, value of clearance from the factory.
	What are the exchange rate rules in your country?	There are no specific exchange rate rules; however, the accounting (and consequent tax payment) is done as per generally accepted accounting principles.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.

1 Service tax is applicable on more than 100 types of services. A few services are currently not taxed, e.g. medical services, transport of goods by rail services.
2 This is an indicative threshold limit - the exact threshold for the purposes of VAT varies as per the state VAT laws.

Invoices	Is a business required to issue tax invoices?	Yes.
	Is it possible to issue invoices electronically?	At present, there are no statutory provisions under VAT, Service tax and excise duty legislations which mandatorily require issuing invoices electronically. However, under the proposed GST regime, there could be provisions related to electronic issuance of invoice.
	Is it possible to issue recipient created tax invoices?	No.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Provision of tax audits (viz. frequency, competent authority, etc.) vary depending upon the legislation (viz. VAT, Service tax, Excise duty). Further, generally while there is no prescribed frequency of tax audits, the relevant tax authorities of each legislation depending upon their internal prescribed criteria (such as turnover, total tax payments, comparatives with the industry, etc.) conduct the audit of the assesses. For example, in the state of Delhi, special audit is required where the same is directed by the Commissioner.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	At present, there are no provisions of E-Audits under VAT, Service tax and Excise duty legislations.
	What penalties can arise from non-compliance	Penalties under VAT, Service tax and Excise duty legislations vary depending upon various factors such as nature and period of non-compliance, intention of the parties, etc.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	• VAT provisions differ depending on the state VAT laws. Some state VAT laws have comparatively more liberal provision than others • no input tax credit for CST is available • input tax credit for VAT paid on goods used in providing services/manufacture of goods cannot be utilised against Service tax/Excise duty liability and vice-versa.
	Does a reverse charge mechanism apply?	• VAT – no • Service tax – yes • Excise duty – not applicable.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Under each legislation (viz. VAT, Service tax, Excise duty), depending upon specified goods, area, capacity, etc, indirect tax incentives (viz. reduced rates, exemptions and zero rating, etc.) are available.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Depending upon the legislation, there are specified criteria (such as the transaction has to be proposed, party seeking advance ruling need to be an overseas entity, etc.) which needs to be fulfilled in order for a person to be eligible to obtain an advance ruling.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database	While these are publicly available through different websites, there is no standard link/database.

Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Customs duty • Entry tax/Octroi • Other local levies including Stamp duty, Entertainment tax and Luxury tax.

India is proposing to introduce a comprehensive Goods and Service Tax (GST) regime in 2012, which would incorporate most of the taxes/duties mentioned above.

Indonesia

General	Types of indirect taxes (VAT/GST and other indirect taxes)	VAT
	What is the standard VAT/GST rate?	The standard rate of VAT is 10 percent. Zero percent for the export of VAT-able goods as well as export of VAT-able services (only applies for provisions of toll manufacturing services, repair and maintenance services and construction services conducted outside Indonesia).
	Are there any reduced rates, zero rates or exemptions?	• A zero rate is applicable to export of VAT-able goods and services (for export of VAT-able services subject to the limitation above). • There is scope in the government regulation for a reduced rate of 5 percent to be applied; however, in practice such a reduced rate has not yet been implemented. • There is an exemption for deliveries and/or import of taxable goods designated as strategic goods. The designation of strategic goods is made through a government regulation and/or Ministry of Finance regulation such as capital goods in the form of machinery and plant or equipment required for the manufacturing of taxable goods, clean water distributed through pipes by drinking water companies, etc. • Other VAT exemptions apply to certain goods or other services in order to support the achievement of certain national objectives such as general education/religious books, train maintenance and repair services received by Indonesian train companies, etc.
Registration	Who is required to register for VAT/GST?	Indonesian taxpayers (companies and individuals) with a turnover of more than IDR600 million are required to be registered as a VAT-able company.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	No.
	Does an overseas company need to appoint a fiscal representative?	No.
	Is VAT/GST grouping possible?	No, however, a company which has branch or other offices in Indonesia can centralise its VAT reporting through its head office.
Compliance	How frequently are VAT/GST returns submitted?	The VAT return is lodged on a monthly basis by end of the following month and electronic monthly filing is almost compulsory for all taxpayers.
	What are the exchange rate rules in your country?	The taxpayer can obtain the license for performing bookkeeping in English and US dollar currency; however, for VAT purposes every transaction in foreign currencies should be converted to IDR by using the weekly exchange rate issued by the Finance Minister at transaction date.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.

Invoices	Is a business required to issue tax invoices?	Yes, once it is registered as a VAT-able taxpayer.
	Is it possible / mandatory to issue invoices electronically?	No.
	Is it possible to issue recipient created tax invoices?	Not applicable as the tax invoice format should follow the standard format as issued by the Indonesian Tax Authorities.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	No, as normally it is undertaken on a sampling basis, however, an automatic audit will be conducted if there is a request for refund. In an audit, the tax official will check the validity of the tax invoices, perform reconciliations with the sales (for output VAT) and purchases (for input VAT) and other financials. The required information should be provided within a specific time as required by the tax office and if the required documents and information are not provided within such specific time, the tax office may ignore the existence of such documents.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	No, it is still conducted manually.
	What penalties can arise from non-compliance?	There are several penalties for non compliance as follows: 1. Late payment: 2 percent per month from the VAT payable 2. Late report: IDR500,000 3. Not issuing tax invoice: 2 percent from the VAT base 4. Claiming "invalid" input VAT invoices: 100 percent of the total claimed amount.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	No.
	Does a reverse charge mechanism apply?	No.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Yes, for certain businesses and based on government regulation or Ministry of Finance regulation.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database	No, rulings are not publicly available since it is addressed specifically to a particular company.
Other indirect taxes	Are there other indirect taxes not commented on above?	• sales tax on luxury goods • stamp duty ("Bea Materai" at IDR6,000, maximum per legal document) • excise and customs duty.

Japan

General	Types of indirect taxes (VAT/GST and other indirect taxes)	Consumption Tax
	What is the standard VAT/GST rate?	5 percent
	Are there any reduced rates, zero rates or exemptions?	A zero rate is applicable to exports. In addition, the Consumption Tax law also provides for exempt supplies for which recovery of input Consumption Tax is not possible.
Registration	Who is required to register for VAT/GST?	A business which makes taxable supplies in Japan, exceeding JPY10 million in the base period, automatically becomes a taxpayer.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	Yes.
	Does an overseas company need to appoint a fiscal representative?	Yes.
	Is VAT/GST grouping possible?	No.
Compliance	How frequently are VAT/GST returns submitted?	Annually, quarterly or monthly depending on turnover.
	What are the exchange rate rules in your country?	For Consumption Tax applying on imports the Customs Authority publishes statutory exchange rates which should be applied in converting any balances in a foreign currency. For other balances the relevant market rate offered by banks / the spot rate for the time of supply should generally be applied.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No. An overseas company needs to first become a taxable entity in order to file a refund claim.
Invoices	Is a business required to issue tax invoices?	No, as Japan does not have VAT invoice system.
	Is it possible / mandatory to issue invoices electronically?	Possible and not mandatory.
	Is it possible to issue recipient created tax invoices?	Yes, on condition that the legal authority to do so is given by the supplier to the recipient.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Yes. National tax office usually conducts it every three years due to the statute of limitation of three years for consumption tax purposes.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	No.
	What penalties can arise from non-compliance?	Under-reporting penalty at basically 15 percent on the incremental tax due can be imposed.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	Imports are always subject to import Consumption Tax upon entry, regardless of whether it is imported by a taxable person or not.
	Does a reverse charge mechanism apply?	No.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	An entity which starts making domestic taxable supplies may be able to have a two year tax holiday if it does not make taxable supplies exceeding the registration threshold in the base period.

Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Taxpayer is usually able to seek informal and non-binding comments from the tax authority.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	No.
Other indirect taxes	Are there other indirect taxes not commented on above?	No.

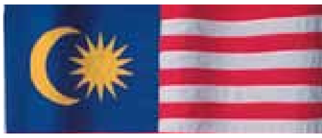
Laos

(The Lao People's Democratic Republic)

General	Type of Indirect tax (VAT/GST)	VAT
	What is the standard VAT/GST rate?	10 percent
	Are there any reduced rates, zero rates or exemptions?	A zero rate applies to goods and services for export. Certain goods and services are exempt from VAT, including: • crop seeds and animals for breeding, pesticides, vaccines, organic and chemical fertilisers • certain imports related to air transport • certain educational operations • specified financial services operations • specified medical services • certain vehicles for specific purposes.
Registration	Who is required to register for VAT/GST?	Business operators who have a minimum annual business turnover of LAK400 million are required to register for VAT with the tax authority and are required to file VAT returns from the day they are registered in the VAT system.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	No.
	Does an overseas company need to appoint a fiscal representative?	No.
	Is VAT/GST grouping possible?	No.
Compliance	How frequently are VAT/GST returns submitted?	Monthly. Importers of goods and services must declare and pay VAT on every importation at the same time as the declaration of customs duties.
	What are the exchange rate rules in your country?	Transactions in a foreign currency need to be translated at the daily rate applicable on the transaction day. The Bank of Lao publishes relevant rates.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.
Invoices	Is a business required to issue tax invoices?	Yes. A company shall complete and submit the tax invoice request form issued by the tax authority for approval to issue tax invoices. The tax authority will take the sales price indicated on the tax invoice as the basis of assessing VAT.
	Is it possible / mandatory to issue invoices electronically?	No.
	Is it possible to issue recipient created tax invoices?	No.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	The tax authority will undertake a combined VAT and corporate tax audit upon yearly submission of the company's tax return.
Audits (continued)	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	No.
	What penalties can arise from non-compliance?	Interest and penalties may be chargeable for non compliance.

Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	No.
	Does a reverse charge mechanism apply?	Yes.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	The Foreign Investment Law (FIL) provides special tax incentives for foreign investors in Laos: • reduced tax rates for foreign companies and personnel where the investment is registered under the FIL • certain investment incentives will be made available to investors where the relevant project relates to encouraging specific sectors or is located in certain regions • if a foreign enterprise is granted an initial tax exemption period of two to four years and suffers losses in that period, it may be permitted to carry the losses forward. The losses may then be deducted from taxes levied on profits in the following year, or be spread over a period of up to three years • raw materials and intermediate components that are imported to achieve import substitution are eligible for special duty reductions.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	No.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database	N/A.
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Business Turnover Tax • Excise tax • Customs duty • Stamp duty.

Malaysia



Introductory note

Currently Malaysia has two primary indirect taxes, sales tax and service tax. The government has announced its intention to replace them with GST, however, the implementation date of GST has been postponed to a date that is to be announced.

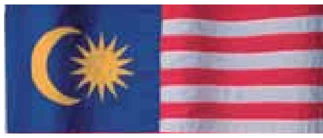
The current sales tax and service tax are summarised below. Businesses are also encouraged to commence planning for the implementation of GST, despite the announcement of the implementation date being postponed. In order to assist businesses in commencing their considerations around the potential impact on their businesses, systems and processes of the introduction of GST in Malaysia, we have provided a summary of the expected GST, based on the current draft law, in the subsequent section.

General	Types of indirect taxes (VAT/GST and other indirect taxes)	• Sales tax - a single stage tax on goods manufactured in Malaysia and goods imported into Malaysia. • Service tax - a single stage tax on prescribed services provided by prescribed taxable persons.
	What is the standard Indirect tax rate?	General sales tax rate is 10 percent. Service tax is 6 percent.
	Are there any reduced rates, zero rates or exemptions	Sales tax • A reduced rate of 5 percent for non-essential foodstuff and specific rates for petroleum products. • Generally, sales tax exemption on plant and machinery, raw materials and components used in the manufacturing process can be applied to the customs authority for approval. Service Tax • Whilst the Ministry of Finance (MOF) is empowered by the law, generally, no exemption is granted for service tax
Registration	Who is required to register for Sales Tax/Service Tax?	Sales Tax • Any person who manufactures taxable goods and having an annual sales turnover above RM100,000. Service Tax • Any taxable person who provides prescribed taxable services and has reached the prescribed threshold (where applicable).
	Is voluntary registration under Sales Tax and Services Tax possible for an overseas company (e.g. if the annual turnover is below the relevant registration threshold)?	Generally, no.
	Does an overseas company need to appoint a fiscal representative?	No.
	Is grouping possible?	There is no grouping provision under the Sales Tax Act, 1972 and Service Tax Act, 1975. However, under service tax, certain professional services provided within the same group of companies are not taxable, subject to meeting certain requirements.
Compliance	How frequently are Sales Tax/Service Tax returns submitted?	Taxable period under both sales tax and service tax is two calendar months. Both sales tax and service tax return is filed within 28 days of the following month of the taxable period.

Compliance (continued)	What are the exchange rate rules in your country?	The foreign currency is converted into Ringgit Malaysia by using the open market rate of exchange prevailing in Malaysia at the time when the supplies take place. For importation, the importer has to use the exchange rates published by the Customs authority.
Recovery	Can an overseas company recover Sales Tax/Service Tax if it is not registered?	No.
Invoices	Is a business required to issue tax invoices?	Yes. Generally, every registered person who makes a taxable supply of goods or services must issue an invoice.
	Is it possible / mandatory to issue invoices electronically?	Yes. It is possible to issue invoices electronically with prior approval of the Director General (DG).
	Is it possible to issue recipient created tax invoices?	No.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Generally, the Customs authority audits are conducted in three to five years cycles.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	Currently, Malaysia does not conduct E-audits for sales tax and service tax.
	What penalties can arise from non-compliance?	For non-compliance of payment of sales tax or service tax within 28 days after the end of the taxable period, registrant will be liable to a penalty of 10 percent of the due amount. If the sales tax or service tax due and payable remains unpaid for more than 30 days after the last payable day, the rate of penalty shall be increased by another 10 percent for every succeeding period of 30 days or part thereof subject to a maximum penalty of 50 percent.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	Yes. Malaysia has specific facilities and rules with regards to free zones and warehousing.
	Does a reverse charge mechanism apply?	No.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Yes. Import duty and sales tax exemption on plant and equipment and raw material or components used directly in manufacturing activity for example can be considered subject to certain conditions.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes. The Customs authority ruling can be applied on classification, valuation and other matters as prescribed by the DG and it is binding for three years.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database	Publicly available rulings and decisions issued by the Customs authority are limited. Certain classification of goods rulings can be found in http://www.customs.gov.my/
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes administered by the Customs authority include: • Excise duty • Customs duty • windfall profit levy • cess.

Malaysia

GST (proposed)



Introductory note

The government has announced its intention to introduce GST to replace the existing sales tax and service tax. However, the implementation of GST has been postponed to a date to be announced.

Businesses are encouraged to commence planning for the future implementation and assessing the impact on their businesses, systems and processes in order to be able to effectively manage the transition when the GST implementation date is announced.

The details below are based on the current draft GST law and may be subject to future amendment before the GST is implemented.

General	Types of indirect taxes (VAT/GST and other indirect taxes)	GST proposed but no definite implementation date indicated. The current consumption tax regimes are sales tax and service tax.
	What is the standard GST rate expected to be?	Proposed 4 percent.
	Are there expected to be any reduced rates, zero rates or exemptions?	Proposed zero-rated supplies: • exports of goods • international services • agriculture products - paddy and fresh vegetables • foodstuff - rice, sugar, table salt, plain flour, cooking oil • livestock supplies - live animals, meat of cattle, buffaloes, goat, sheep and swine • poultry - live and unprocessed meat of chicken and duck • egg (fresh and salted) and fish • supply of the first 200 units of electricity to domestic users • supply of the first 35 cubic meters of water to domestic users. Proposed exempt supplies: • financial services (e.g. loan) • sale and lease of residential property (including land) • toll highway • private health and education • domestic transportation of passengers. • land for agricultural purposes and land for general use (government building and burial ground).
Registration	Who would be required to register for GST?	It is proposed that any person whose businesses with annual turnover exceeding RM500,000 will be required to register for GST.
	Is voluntary registration under Sales Tax and Services Tax possible for an overseas company (e.g. if the annual turnover is below the relevant registration threshold)?	Yes. Voluntary registration is possible for an overseas company but subject to certain requirements.

Registration (continued)	Would an overseas company need to appoint a fiscal representative?	Yes.
	Will GST grouping be possible?	Yes. Companies can be treated as members of a group provided certain conditions are met. For companies that successfully register as a group, taxable supplies within the group are disregarded.
Compliance	How frequently would GST returns need to be submitted?	Standard GST returns are filed on a quarterly basis. Taxable persons with annual turnover exceeding RM5 million will be required to file monthly. Half yearly filing can be applied to the Director General (DG) for approval.
	What are the exchange rate rules in your country?	The foreign currency is converted into Ringgit Malaysia by using the open market rate of exchange prevailing in Malaysia at the time when the supplies take place. For importation, the importer has to use the exchange rates published by the customs authority.
Recovery	Will an overseas company be able to recover GST if it is not registered for GST locally?	No.
	Are there any exemptions expected with the right to recover or deduct input GST?	It is being considered for the financial services sector.
	Are there any exemptions expected without the right to recover or deduct input GST?	No.
Invoices	Will a business required to issue tax invoices?	Yes. Every registered person is required to issue a tax invoice for their taxable supplies. However, tax invoice for a zero-rated supply is not required.
	Will it be possible / mandatory to issue invoices electronically?	Yes, subject to meeting certain requirements.
	Is it expected to be possible to issue recipient created tax invoices?	Yes, with prior approval of the DG.
Audits	Would tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Generally, the customs authority audits are conducted in three to five years cycles.
	Are GST audits expected to be undertaken electronically in your country (E-Audit)? If so, what system will be used?	Not expected to practice E-audits on GST.
	What penalties are expected for non-compliance?	For non compliance of payment of goods and service tax by the last day of the month following the end of the taxable period, registrant will be liable to a penalty of: • 5 percent if within 30 days; • additional 5 percent after 30 days but not exceeding 60 days; and • additional 3 percent for every subsequent 30 days or part thereof, and subject to a maximum of 25 percent.

Audits (continued)	Will a reverse charge mechanism apply?	Yes. The recipient of the imported services is treated as having made the supply to himself and accounts for the output tax. The recipient may then claim the corresponding input tax incurred by him, provided he is a taxable person and the credit is not specifically blocked.
	Are there expected to be indirect tax incentives available (e.g. reduced rates, tax holidays)?	Yes. There are GST schemes such as Approved Trader Scheme (ATS), Approved Toll Manufacturer Scheme (ATMS), warehousing scheme, designated areas, etc. Such schemes are generally available to help alleviate the cash flow problems faced by certain GST registrants. For example, ATS is introduced to help importers who mainly re-export their supplies to suspend payment of GST.
Rulings	Do you expect it to be possible to apply for formal or informal advance GST rulings from the tax authority?	Yes.
	Are rulings and decisions issued by the tax authorities will be publicly available in your country? If so, please provide us with the link to the database.	Based on current practice, no.

New Zealand

General	Type of indirect tax (VAT/GST)	GST
	What is the standard VAT/GST rate?	15 percent
	Are there any reduced rates, zero rates or exemptions?	Zero-rated supplies include: • export of goods • export of certain services • supply of emission trading scheme units • supply of financial services under the Business to Business regime or supplies to non-residents. Exempt supplies include: • supplies of fine metal • supplies of financial services that are not zero-rated • supplies of residential accommodation. Reduced rates apply for the provision of certain long-term accommodation.
Registration	Who is required to register for VAT/GST?	Anyone who makes or expects to make more than NZD60,000 of taxable supplies in any 12 month period is required to register for GST.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	Yes, as long as the overseas company makes taxable supplies in New Zealand (currently discussion is taking place to expand registration of overseas companies).
	Does an overseas company need to appoint a fiscal representative?	No.
	Is VAT/GST grouping possible?	Yes.
Compliance	How frequently are VAT/GST returns submitted?	• Monthly – if the value of taxable supplies is more than NZD24 million in a 12 month period. • Every two months – if the value of taxable supplies is less than NZD24 million. • Every six months – if the value of taxable supplies is less than NZD500,000 in a 12 month period and an application is made to the commissioner. In any case, it is possible to file monthly GST returns even though the value of taxable supplies in a 12 month period is less than NZD24 million.
	What are the exchange rate rules in your country?	Exchange rates are published on the Inland Revenue Department (IRD) website, or a business can use the exchange rates of an IRD approved bank.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.
	Are there any exemptions with the right to recover or deduct input VAT?	No.
	Are there any exemptions without the right to recover or deduct input VAT?	Yes. All exempt supplies deny the right to recover or deduct input GST.

Invoices	Is a business required to issue tax invoices?	Generally yes, if requested by the recipient of the taxable supply.
	Is it possible to issue invoices electronically?	Yes.
	Is it possible to issue recipient created tax invoices?	Yes, but requires prior approval of the IRD.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Tax audits are undertaken at the discretion of the IRD. The frequency varies. The IRD can check all business records required to be kept under the GST Act 1985 and the systems in place by the business to ensure compliance.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	Yes, but they are conducted infrequently.
	What penalties can arise from non-compliance?	• A first transgression attracts a warning. • Late filing penalty is NZD250 or NZD50 (invoice & hybrid basis/payments basis) on any further transgressions in a 12 month period. • Late/incorrect payment: – 1 percent of the amount unpaid on due date. – 4 percent if the amount is not paid a week after the due date. – A further 1 percent for each month past the due date the GST is unpaid.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	Yes, the New Zealand GST law allows the zero-rating of financial services under the business to business regime. Financial services are generally exempted, however, if the recipient of the services is registered for GST and makes more than 75 percent taxable supplies, the supplier can elect to participate in the business to business regime and zero-rate the supply. A zero-rated supply is a taxable supply for New Zealand GST purposes and enables the supplier to recover input GST incurred (which is not possible for input GST incurred in regard to exempted financial services).
	Does a reverse charge mechanism apply?	Yes.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	No.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes, it is possible to apply for a public, private or product ruling. Additionally, informal rulings can be obtained by writing to the IRD.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	Public and product rulings are publically available.
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Customs duty • Excise duty.

Papua New Guinea

General	Types of indirect taxes (VAT/GST and other indirect taxes)	GST
	What is the standard VAT/GST rate?	10 percent
	Are there any reduced rates, zero rates or exemptions?	There are no reduced rates. Supplies are classified into taxable, zero-rated[1] and exempt supplies. Zero-rated supplies include: • exports • international transport • most medical supplies • certain fine metals • certain supply of unprocessed petroleum • supply to resource companies, other than cars • supply to religious, charitable or educational institutions • supply to prescribed foreign aid provider • sale of business as a going concern. Exempt supplies include: • most financial services • educational services • medical services • most fine metals • public road transport • newspapers • betting, lotteries and games of chance • postage stamps • housing or motor vehicle provided by employer.
Registration	Who is required to register for VAT/GST?	Any person who carries on a taxable activity and the total value of supplies (excluding exempt supplies) has exceeded PGK100,000 in the last 12 months, or is expected to exceed PGK100,000 in the coming 12 months, has a liability to register for GST.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	Yes. A non-resident company carrying on any taxable activity in Papua New Guinea or intending to carry on taxable activity from a specified date may voluntarily register for GST.
	Does an overseas company need to appoint a fiscal representative?	Every overseas company carrying on business in Papua New Guinea is required to obtain certification from the Investment Promotion Authority and appoint a resident agent.
	Is VAT/GST grouping possible?	Yes, subject to meeting certain requirements.
Compliance	How frequently are VAT/GST returns submitted?	GST returns are lodged monthly and required to be lodged with the tax authority on or before the 21st day from the end of the month.
	What are the exchange rate rules in your country?	All amounts to be expressed in terms of Papua New Guinea Kina (PGK) and consideration for supply to be converted at rate applicable at time of supply.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.

[1] For a zero-rated supply, no GST is levied but the registered supplier is entitled to claim input tax paid on acquisitions relating to that supply.

Invoices	Is a business required to issue tax invoices?	Yes, except in cases where the value of supplies is less than PGK50.
	Is it possible / mandatory to issue invoices electronically?	Yes, it is possible to issue tax invoices electronically, provided the tax invoices contain all the required particulars and the express consent of the Commissioner is obtained.
	Is it possible to issue recipient created tax invoices?	Yes.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	A desk audit initiated by the taxpayer is generally required to substantiate a claim for a GST refund. Internal Revenue Commission (IRC) initiated audits are irregular.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	No.
	What penalties can arise from non-compliance?	Penalties can range from PGK1,000 to PGK50,000 depending on the offence.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from “standard” indirect tax rules in other jurisdictions?	No.
	Does a reverse charge mechanism apply?	Yes.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	No.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	No.
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Stamp duty • Customs duty • Excise duty • Royalty, mining and development levy.

Philippines

General	Type of indirect tax (VAT/GST)	VAT
	What is the standard VAT/GST rate?	12 percent
	Are there any reduced rates, zero rates or exemptions?	Zero-rated sales include: • export sales • foreign currency denominated sales • sales to persons or entities deemed tax-exempt under special laws or international agreements. VAT-exempt sales generally include: • sale or lease of goods or properties or the performance of services with gross annual sales and/or receipts not exceeding PHP1.5 million. • sale by agricultural cooperatives duly registered with Cooperative Development Authority to their members • real property not primarily held for sale to customers or held for lease in the ordinary course or trade of business • real properties utilised for low-cost housing and social housing • leasing of residential units with a monthly rental per unit not exceeding PHP10,000.
Registration	Who is required to register for VAT/GST?	• Any person who, in the course of trade or business in the Philippines, sells, barters or exchanges goods or properties or engages in the sale or exchange of services shall be required to register if: - The gross sales or receipts for the past 12 months, other than those that are exempt under Sec. 109 (1) (A) to (U) of the Tax Code, have exceeded PHP1.5 million; or - There are reasonable grounds to believe that gross sales or receipts for the next 12 months, other than those that are exempt under Sec. 109 (1)(A) to (U) of the Tax Code, will exceed PHP1.5 million.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	No. Voluntary VAT registration of a non-resident company in the Philippines is not possible, especially if the company does not sell goods or provide services in the Philippines.
	Does an overseas company need to appoint a fiscal representative?	No.
	Is VAT/GST grouping possible?	No, there is no grouping in the Philippines for VAT purposes.
Compliance	How frequently are VAT/GST returns submitted?	VAT returns shall be filed on a monthly and quarterly basis. The monthly VAT declarations are filed for the first two months of each quarter, while the quarterly VAT returns reflect the cumulative figures for the taxable quarter.

Compliance (continued)	What are the exchange rate rules in your country?	As a general rule, the Monetary Board determines the exchange rate policy in the Philippines including which rate the Bangko Sentral ng Pilipinas (BSP) shall buy and sell spot exchange, and shall establish deviation limits from the effective exchange rate or rates as it may deem proper. However, Philippine taxpayers which have adopted functional currency (other than Philippine peso (PHP)) in their financial statements and books of accounts are still required to prepare their Philippine tax returns in PHP. For purposes of translating the functional currency income and expenses to PHP, the translation shall be done on a monthly basis using the average exchange rate during the month provided by the Philippine Dealing System or "PDS".
Recovery	Can an overseas company recover VAT / GST if it is not registered for VAT / GST locally?	No.
Invoices	Is a business required to issue tax invoices?	A VAT-registered person is required to issue: 1. A VAT invoice for every sale, barter or exchange of goods or properties; or 2. A VAT official receipt for every lease of goods or properties, and for every sale, barter or exchange of services.
	Is it possible / mandatory to issue invoices electronically?	Yes, e-invoicing is permitted, including e-credit notes provided the taxpayer has obtained the proper authority from the Philippine Bureau of Internal Revenue (BIR).
	Is it possible to issue recipient created tax invoices?	No.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	As a general rule, tax audits by the BIR are conducted or authorised on an annual basis; however, all internal revenue taxes may only be assessed within three years after the last day prescribed by law for the filing of the return. In case of a false or fraudulent return with intent to evade tax or failure to file a return, the tax may be assessed at any time within 10 years after the discovery of the falsity, fraud or omission. As a general rule, tax audits will cover all the relevant tax returns, which will be verified with the financial records of the company. In addition, the BIR verifies supporting documents such as invoices and/or official receipts. The Commissioner of Internal Revenue or his duly authorised representative has the power to assess any taxpayer. As a general principle, deficiency tax findings of the BIR have the presumption of correctness, which the taxpayer may rebut.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	As a general rule, tax audits are done manually through the issuance of Letter of Authority from the BIR. However, for taxpayers using the Electronic Filing and Payment System (eFPS), the returns electronically submitted to the BIR system may be the basis of the tax audit.

Audits (continued)	What penalties can arise from non-compliance?	Penalties for non-compliance depend on the taxpayer's violations: **Common penalties for failure to file a return or erroneous filing of return** 1. The payment of the amount indicated in the deficiency tax assessment; 2. Upon conviction, a fine of not less than PHP10,000 and suffer imprisonment of not less than one year but not more than 10 years; 3. In case the failure to file a return is due to an attempt to evade or defeat any tax, upon conviction, a fine of not less than PHP30,000 but not more than PHP100,000 and suffer imprisonment of not less than two years but not more than four years; 4. Penalty surcharge equivalent to 25 percent of the tax due; 5. Interest at the rate of 20 percent on the amount of tax due on any return required to be filed. **Penalties for non-compliance on final/formal tax deficiency assessment** 1. In the case of non-payment or partial payment of taxes due, payment of the amount indicated in the deficiency tax assessment; 2. Distrait of goods, chattels, or effects, and other personal property of whatever character including stocks and other securities, debts, credits, bank accounts and interest in and rights to personal property; 3. Levy upon real property and interest in or rights to real property; 4. Civil or criminal action; 5. In certain instances, penalty surcharge equivalent to 25 percent of the amount due; 6. Interest at the rate of 20 percent per annum from the date prescribed for payment until the amount is fully paid.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	• withholding of VAT on sales to Philippine Government • transitional Input tax • presumptive Input tax.
	Does a reverse charge mechanism apply?	No.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Entities registered with the designated Philippine economic zones enjoy a 5 percent preferential tax rate on gross income, in lieu of all other taxes; hence, sales are effectively exempt from indirect taxes.

Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes, application for a formal ruling with the BIR is allowed. However, informal advance rulings are not permitted. Generally, only actual transactions may be the subject of a formal ruling. Hypothetical transactions are not ruled upon as a matter of policy.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	Yes, copies of the rulings can be found at the National Office of the BIR. Moreover, decisions of the Court of Tax Appeals ("CTA") and even the Supreme Court ("SC") are accessible in the SC website. The website of SC is http://sc.judiciary.gov.ph
Other indirect taxes	Are there other indirect taxes not commented on above?	Percentage taxes • percentage tax on domestic carriers and keepers of garages • percentage tax on international carriers • tax on franchises • tax on overseas dispatch, message or conversation originating from the Philippines • tax on banks and non-bank financial intermediaries • tax on finance companies • tax on life insurance premiums • tax on agents of foreign insurance companies • amusement taxes • tax on winning • tax on sale, barter or exchange of shares of stock listed and traded through the local stock exchange or through Initial Public Offering Excise taxes • payment of excise taxes on imported articles • excise tax on alcohol, tobacco, petroleum, mineral products and other miscellaneous items. • Customs duty.

Singapore

General	Types of indirect taxes (VAT/GST and other indirect taxes)	GST
	What is the standard VAT/GST rate?	7 percent
	Are there any reduced rates, zero rates or exemptions?	Zero-rated supplies include: • certain international services • export of goods • supplies of certain tools, machinery and prototypes. Exempt supplies include a defined set of financial services and the sale or lease of residential property.
Registration	Who is required to register for VAT/GST?	Generally, a person who makes or expects to make more than SGD1 million of taxable supplies in a 12 month period is required to register for GST.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	Generally, voluntary GST registration is possible for an overseas company if it makes taxable supplies in Singapore.
	Does an overseas company need to appoint a fiscal representative?	Yes, if the overseas company does not have a branch in Singapore.
	Is VAT/GST grouping (*) possible?	Yes, subject to certain requirements.
Compliance	How frequently are VAT/GST returns submitted?	GST returns are lodged quarterly. A request can be made to the Comptroller of GST to allow the GST registered entity to lodge its returns monthly or half-yearly.
	What are the exchange rate rules in your country?	The values of supplies and output tax should be converted into Singapore currency at the selling rate of exchange prevailing in Singapore at the time of supply or the supplier's in-house exchange rate approved by the Comptroller of GST.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.
Invoices	Is a business required to issue tax invoices?	GST registered businesses are required to issue tax invoices for standard-rated supplies made to a taxable person.
	Is it possible / mandatory to issue invoices electronically?	Yes, subject to meeting certain requirements.
	Is it possible to issue recipient created tax invoices?	Yes, subject to meeting certain requirements.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	No specified frequency for GST audit by the Comptroller of GST. The Comptroller of GST could check on the figures and supporting documents relating to the GST treatment adopted by the business. The competent authority is the Inland Revenue Authority of Singapore (IRAS). However, if it is relating to import declaration, the competent authority is the Singapore Customs.

Audits (continued)	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	Audits can be conducted by the IRAS and the Singapore Customs officers visiting the business, raising questions over the phone or via email/letter. The IRAS or the Singapore Customs officers may also deploy computer assisted audit techniques in their audits.
	Briefly describe the Assisted Compliance Assurance Programme (ACAP).	ACAP is a compliance initiative for GST-registered businesses that set up robust GST Control Framework as part of good corporate governance. GST registered businesses can on a voluntary basis conduct a holistic risk-based review to endorse the effectiveness of their GST controls. The review is to be performed with the assistance of an independent ACAP Reviewer. GST registered businesses that participate in ACAP and accorded ACAP status by the IRAS will enjoy a suite of benefits. Currently, the IRAS is co-funding the external costs that the GST registered businesses incurred in performing the ACAP review.
	What penalties can arise from non-compliance?	The GST legislation provides for various penalties including: • Late filing - SGD200 for each completed month that the taxable person continues not to submit the return but the total penalty shall not exceed SGD10,000. • Late payment of GST - A penalty equal to 5 percent of the amount of tax payable with additional penalties applying if the amount remains unpaid. • Other penalties can apply for GST fraud or negligence.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	Yes. There are a number of GST schemes that are developed locally to address the concerns faced by GST registered businesses. Please see indirect tax incentives below.
	Does a reverse charge mechanism apply?	The GST law provides for a reverse charge mechanism. However, the Ministry for Finance has not prescribed any services for the purpose of the reverse charge.

Special indirect tax rules (continued)	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Yes. There are GST schemes in place. For example, some help to alleviate the cash flow problems of GST registered businesses by suspending the payment of GST on importation of goods. Examples include the Major Exporter Scheme (MES), Approved Third Party Logistics Company Scheme (A3PL) as well as the Approved Contract Manufacturer and Trader Scheme (ACMT). The ACMT also allows for value added activities provided by an ACMT trader on goods consigned from an overseas customer to be disregarded for GST purposes. In the case of the Approved Marine Fuel Trader Scheme (AMFT), approved businesses need not pay GST on the local purchase of marine fuel oil.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	No.

South Korea

General	Types of indirect taxes (VAT/GST and other indirect taxes)	VAT
	What is the standard VAT/GST rate?	10 percent
	Are there any reduced rates, zero rates or exemptions?	Supplies of the following goods and services are zero-rated: • goods for export • services rendered outside of South Korea • international transportation services by ships and aircraft • other goods or services supplied for foreign exchange earnings. Supplies of the following goods and services are exempt: • certain basic goods and services • specified social welfare services, including medical, health and education services • goods and services related to culture, including books, newspapers, magazines, artistic works, admission to libraries, museums, art galleries • certain academic and technical research services • other goods and services such as postage stamps, goods or services rendered by the government and local authorities, finance and insurance services.
Registration	Who is required to register for VAT/GST?	A person who engages in the supply of goods or services independently in the course of business, whether or not for profit, is liable for VAT.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	If an overseas company has a permanent establishment in South Korea, the PE may be required to register for VAT purposes.
	Does an overseas company need to appoint a fiscal representative?	No.
	Is VAT/GST grouping possible?	No.
Compliance	How frequently are VAT/GST returns submitted?	Quarterly.
	What are the exchange rate rules in your country?	If the price of a product or service was converted into Korean Won before the product or service was actually provided, the converted price would be regarded as the supply price for VAT purposes. If a taxpayer received payment in foreign currency upon supply of a product or service, the supply price of such product or service would be computed by multiplying the spot exchange rate on the date of the transaction (determined in accordance with the Foreign Currency Transaction Act) by the price of the product/service denominated in foreign currency.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.
Invoices	Is a business required to issue tax invoices?	Yes.
	Is it possible / mandatory to issue invoices electronically?	Yes, from 2011, corporate taxpayers are required to issue electronic invoices

Invoices (continued)	Is it possible to issue recipient created tax invoices?	Yes. Under the Tax Incentive Limitation Law (TILL), in cases where a taxpayer fails to issue a tax invoice at the time of a VAT-able transaction, the recipient may issue a tax invoice, subject to confirmation by the head of the competent tax office under the conditions as prescribed in the TILL.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Most tax audits are conducted on a regular basis (i.e., every 4-5 years). VAT audits are not conducted on a stand-alone basis but are conducted along with corporate income tax and withholding tax audits. If a taxpayer is not in compliance with VAT filing/payment obligations, the tax authority suspects tax evasion, or the government decides to conduct tax audits on companies within a specific industry, the tax authority may conduct a tax audit on an ad hoc basis.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	The tax auditors may conduct a tax audit electronically in part. For instance, the auditors may use the National Tax Service's internal system to run basic checks on a taxpayer's VAT filing/payment status. Also, the auditors may perform an audit electronically by accessing the taxpayer's database or IT system to review certain information.
	What penalties can arise from non-compliance?	The provisions of the VAT law provide for various types of penalties for non-compliance. For general penalties: • Failure to register: 1 percent of the total value of goods and services supplied from the date of omission until the date of compliance. • Failure to issue VAT receipts or issuing erroneous VAT receipts: 1 or 2 percent of the value of the transactions concerned. • Failure to file returns and to pay VAT: 10 percent of the tax due and 10.95 percent per annum. • Failure to report the tax base subject to zero-rate VAT: 1 percent of the value of the transactions concerned.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	No.
	Does a reverse charge mechanism apply?	Yes.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	No.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	Yes: http://taxinfo.nts.go.kr/index.jsp (available only in Korean)

Other indirect taxes	Are there other indirect taxes not commented on above? If yes, could you please briefly specify?	Yes, other indirect taxes include: • stamp tax • customs duty • liquor tax • securities transaction tax • individual consumption tax.

Sri Lanka

General	Types of indirect taxes (VAT/GST and other indirect taxes)	VAT
	What is the standard VAT/GST rate?	12 percent
	Are there any reduced rates, zero rates or exemptions?	A zero rate applies to: • Goods, where the supplier of such goods is the exporter. • Certain services, e.g. services directly connected with: – property outside Sri Lanka – repair of any foreign ship, aircraft or any merchant ship or the refurbishment of marine cargo containers – goods imported into Sri Lanka for the purpose of re-export under entre-port trade – a copyright, patent, license, trade mark or similar intellectual property right for use outside Sri Lanka – international transportation (including transshipment) of goods or passengers – computer software development for use wholly outside Sri Lanka, and for which payment is received in foreign currency through a bank – client support services provided over the internet or the telephone by an enterprise set up exclusively for the provision of such services to identified clients outside Sri Lanka – services to be consumed or utilised outside Sri Lanka provided that payment has been received in foreign currency through a bank in Sri Lanka. Exempt categories of goods include: • paddy, rice, wheat, sugar and flour • drugs, medicines, aids and implements used by handicapped persons • ayurvedic preparations • gold coins, precious stones and metals • aircraft and helicopters, agricultural tractors • books, periodicals and journals • crude petroleum oil, kerosene, liquid petroleum gas, diesel, aviation fuel and oil for ships • aids and implements used by handicapped persons • cellular mobile phones • agricultural machinery and fertiliser • agricultural implements operated manually or driven by animals • textile • prawns

General (continued)		• machinery and equipment for leather or footwear industry, manufacture of bags, manufacture of grain mixed bakery products • locally developed software, locally manufactured briquettes and pallets using bio mass waste. Exempt services include: • insurance • certain financial services • education • health and welfare • telecommunication
Registration	Who is required to register for VAT/GST?	Every person who imports goods into Sri Lanka and/or carries on a taxable activity where the value of the supply exceeds: • LKR650,000 per taxable period ; or • LKR2.5 million per annum.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	Yes, any entity which does not meet the registration threshold may apply for voluntary registration, which is granted at the discretion of the Commissioner General Of the Inland Revenue Department.
	Does an overseas company need to appoint a fiscal representative?	Yes.
	Is VAT/GST grouping possible?	No.
Compliance	How frequently are VAT/GST returns submitted?	VAT payments are made monthly and returns filed monthly/quarterly, subject to certain criteria.
	What are the exchange rate rules in your country?	Invoices can be issued in a foreign currency if desired. In order to account for the VAT on transactions conducted in a foreign currency, the usual practice is to convert the balance at the appropriate spot rate for the time of supply. The Central Bank of Sri Lanka publishes rates.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.
Invoices	Is a business required to issue tax invoices?	Yes. Tax invoices should be issued only to VAT registered persons.
	Is it possible / mandatory to issue invoices electronically?	No.
	Is it possible to issue recipient created tax invoices?	No.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Tax audits do take place but there is no specific period as such. However, in the case of refunds, tax audits are carried out on a regular basis depending on the particular case.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	No.

Audits (continued)	What penalties can arise from non-compliance?	Failure to apply for registration may result in a liability to a fine not exceeding LKR25,000, or to imprisonment of either description for a term not exceeding six months, or both. Late payment penalties are levied initially at a rate of 10 percent from the day after the due date for payment of the VAT. A further 2 percent is levied if the outstanding amount remains unpaid before the last day of each month succeeding the month in which such tax is in default. However, the total amount payable as penalty should not exceed 100 percent of the tax in default.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	• Financial VAT – a system of taxing specified financial services provided by any person at a rate of 12 percent on the value added. • Simplified VAT – This was introduced with the objective of reducing the refunds to be issued by the tax authorities. • Optional VAT – Taxpayers whose aggregate turnover is below the threshold but of significant value may opt for registration under the scheme. Optional VAT Scheme does not provide for claiming of input credits. • Input tax credit restricted to 100 percent of output tax, with certain exceptions.
	Does a reverse charge mechanism apply?	No.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Yes.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database.	Yes: www.inlandrevenue.gov.lk
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Nation Building Tax • Customs duty • Excise duties • Stamp duty • cess • Ports And Airports Development Levy • Construction Industry Guarantee Levy.

Taiwan

General	Types of indirect taxes (VAT/GST and other indirect taxes)	Taiwan has two systems of business tax: • Gross Business Receipts Tax (GBRT) – used by financial institutions, special vendors of beverages and food, and small businesses. • VAT – used by the remaining taxpayers.
	What is the standard VAT/GST rate?	• VAT – Standard rate 5 percent. • GBRT: – Financial institutions: 2 percent for core business revenue; 1 percent for reinsurance premiums of insurance enterprises; or 5 percent for non-core business revenue. – Special vendors of beverages and food: 15 percent or 25 percent. – Small businesses: 1 percent or 0.1 percent.
	Are there any reduced rates, zero rates or exemptions?	A zero rate for VAT applies to the following transactions: • Exported goods. • Services relating to export or services provided in Taiwan but used in a foreign country. • Goods sold to outbound or transit passengers by duty-free shops established under applicable law. • Goods or services sold to a bonded zone business entity for its operational use. • International transportation; however, foreign transport enterprises engaging in international transport within the territory of Taiwan shall qualify for the zero tax rate only if reciprocal treatment, or exemption from similar taxes, is given to international transport enterprises of Taiwan by the foreign country in which the foreign enterprise is incorporated. • Vessels and aircraft used in international transportation and deep sea fishing boats. • Sales of goods and maintenance services to vessels and aircraft used for international transportation and deep sea fishing boats. • Goods sold by a bonded zone business entity to a taxable zone business entity and exported directly without being transported to the taxable zone. • Goods sold by a bonded zone business entity to a taxable zone business entity for export and placed in a bonded warehouse or logistics centre administered by an enterprise inside a free trade zone or by customs authority.

General	Are there any reduced rates, zero rates or exemptions? (continued)	Examples of transactions that are exempt from VAT include: • Sale of land. • Water supplied to farmland for irrigation. • Medical services, medicine, ward lodging and meals provided by hospitals, clinics and sanatoriums. • Education services offered by schools, kindergartens, and other educational and cultural institutions including cultural services offered under government's consignment. • Publications which are textbooks authorised by education authorities for use at various levels of schools and important specialised academic writings awarded by the government according to the law issued by the publishing industry. • Goods or services sold by student-run shops of vocational schools which do not serve outsiders. • Certain newspapers, magazines, newsletters, advertisements, television and broadcasting programs goods or services sold to their members by cooperatives managed in accordance with the law; and business consigned by government to said cooperatives.
Registration	Who is required to register for VAT/GST?	The head office of a business entity and its branches with fixed places of business in Taiwan shall each file an application for business registration individually with the competent tax authority before commencement of business.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	No. An overseas company without a fixed place of business in Taiwan cannot apply for business tax registration in Taiwan. Their fixed place of business in Taiwan will be required to file for business registration before commencement of business.
	Does an overseas company need to appoint a fiscal representative?	No. Taiwan business tax law does not require an overseas company to appoint a fiscal representative. However, depending on the business activities to be performed, other relevant Taiwan tax laws may require an overseas company to establish a fixed place of business or appoint a business agent in Taiwan before commencing the business activities.
	Is VAT/GST grouping possible?	A business entity may apply for approval from the Ministry of Finance to combine the sales of goods or services of the head office and all branches and file a consolidated tax return to report sales, tax payable or tax overpaid to the local collection authority-in-charge of the head office.
Compliance	How frequently are VAT/GST returns submitted?	Generally, the VAT return is required to be filed every two months. A company eligible for zero rate VAT may apply to file a monthly VAT return.
	What are the exchange rate rules in your country?	Exchange rate at the transaction date is used to record sales and VAT amount invoiced in foreign currency.

Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No. An entity not VAT-registered in Taiwan generally cannot recover or claim VAT refund. One exception is that VAT may be refundable if it relates to a foreign company participating in exhibitions or conducting temporary business activities such as market investigations, trainings, procurements in Taiwan provided that certain conditions are met.
Invoices	Is a business required to issue tax invoices?	Yes. The business entity selling goods or services must issue Government Uniform Invoices (GUI) to the buyer. There are some exemptions to this such as sales related to export of goods; or sales provided certain conditions are met and documentation are obtained. The GUI must be printed and sold by the government, or companies must be authorised to print their own GUI upon approval by the Ministry of Finance.
	Is it possible / mandatory to issue invoices electronically?	Yes. E-tax invoices or computerised GUI can be issued if the prior approval is obtained from the local tax authority.
	Is it possible to issue recipient created tax invoices?	No.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Generally, the local tax office is likely to initiate a tax audit in the following timing and situations: • About half a month after each every two months VAT filing period: Where the buyer of goods or services reported input VAT while the seller did not report output VAT. • On a case by case basis: – Where a company has significant accumulated input VAT – Where the tax authority conducted an income tax audit which impacted VAT
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	The Taiwanese Tax Authority uses certain in-house software to undertake data analysis to identify targets for tax audits; however, the tax audit itself generally doesn’t include the use of e-audit approaches.

Audits (continued)	What penalties can arise from non-compliance?	• Penalty for non-registration or late registration: A penalty of between TWD3,000 and TWD30,000 can apply. • Late filing surcharge: 1 percent of tax payable for every two days in arrears up to 15 percent, penalty shall be no less than TWD1,200 but not exceeding TWD12,000. Over 30 days overdue, penalty at 30 percent of assessed tax payable will apply and shall be no less than TWD3,000 but not exceeding TWD30,000. • Non-reporting (non-filing) surcharge: 30 percent of assessed tax payable will apply and shall be no less than TWD3,000 but not exceeding TWD30,000. However, if taxpayer did not report nor pay any indirect tax payable, "Penalty for under-reported tax" will apply instead of Non-reporting Surcharge. • Underpayment surcharge: 1 percent of assessed tax payable (which includes both tax underpaid and applicable non/late-reporting surcharges) for every two days in arrears, not to exceed 15 percent. The tax authority may pass the case to the court for compulsory execution and may suspend the company's business if the payment is 30 days overdue. • Penalty for under-reported tax: penalty can be applied up to 5 times of assessed tax under-reported; the tax authority may suspend the company's business. • Penalty for failure to issue GUIs: in addition to tax payable assessed at the under-reported sales multiplied by applicable indirect tax rate, penalty can be applied between one to 10 times of assessed tax payable. The tax authority may suspend the company's business if such violation is found more than three times within one year.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	Please refer to "Type of indirect tax" above.
	Does a reverse charge mechanism apply?	Yes. Where a foreign company without a fixed place of business in Taiwan sells services in Taiwan, the VAT responsibility is passed to the service recipient. However, this VAT is exempt if the purchaser solely engages in VAT-taxable business.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Please refer to "Are there any reduced rates, zero rates or exemptions?"
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes. Where current laws are unclear about how taxes should apply to a specific situation or where the company would like to obtain a confirmation on a specific tax treatment, the company may apply for a ruling with the tax authority. This can be done under the company's name or anonymously.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database	Yes. Please visit the Taxation and Tariff Committee, Ministry of Finance's database: http://www.ttc.gov.tw/qp.asp?ctNode=97&CtUnit=40&BaseDSD=31

Rulings (continued)		For newly issued rulings, please visit the Taxation Agency, Ministry of Finance's database: http://www.dot.gov.tw/dot/home.jsp?mserno=200912140006&serno=200912140020&menudata=DotMenu&contlink=ap/law/newlaw.jsp&level2=Y&qclass
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • Commodity tax • Tobacco and liquor tax • Amusement tax • Special goods and services tax (Luxury tax) • Customs duty.

Thailand

General	Types of indirect taxes (VAT/GST and other indirect taxes)	VAT
	What is the standard VAT/GST rate?	Seven percent (this is a temporary rate, reduced from the standard rate of 10 percent, introduced by a special Royal Decree valid until 30 September 2012). It is likely to be extended beyond that date at 7 percent.
	Are there any reduced rates, zero rates or exemptions?	A zero rate applies to certain transactions, including: • export of goods • bringing domestic goods into a duty free zone (treated as an export) • sale of goods belonging to a bonded duty free shop made to a person travelling to a foreign country • provision of services performed in Thailand and used in foreign countries • provision of services performed in Thailand for manufacturing goods in a duty free zone for exports • provision of services performed in a duty free zone for manufacturing goods for exports • provision of international transport services by aircraft or sea-going vessels by a supplier who is a juristic person • sale of goods and provision of services to government authorities under a foreign loan or assistance project • sale of goods and provision of services to the United Nations Organisation, its special agencies, an embassy, legation, consulate-general or consulate • sale of goods and provision of services between a bonded warehouse and other bonded warehouses or between a duty free zone and other duty free zones. Certain supplies are exempt from VAT, for example: • fertilisers • fish meals, animal feeds • newspaper, magazines or textbooks • educational services • healthcare services • services of international transport by land • rent of an immovable property • sales of goods or provision of services by a • ministry, sub-ministry or department • imports of goods brought into a duty free zone when re-exported.

Registration	Who is required to register for VAT/GST?	A supplier carrying on the business of selling goods and providing services must register for VAT if the tax base of its business exceeds THB1.8 million.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	Yes. A supplier residing outside Thailand and temporarily selling goods or providing services in Thailand for a period exceeding one year but not exceeding three years is entitled to apply for temporary VAT registration before commencing the business. Contracts for selling goods or providing services should be in writing and provided to the Revenue Department with the application for temporary registration.
	Does an overseas company need to appoint a fiscal representative?	Yes.
	Is VAT/GST grouping possible?	No.
Compliance	How frequently are VAT/GST returns submitted?	All registered VAT operators are required to account for VAT by submitting VAT return forms on a monthly basis. Any VAT due is liable to be paid on or before the 15th day of the following month.
	What are the exchange rate rules in your country?	If the payment received or receivable from the sale of goods, import or provision of services is in a foreign currency, the foreign currency must be converted into the Thai currency (THB). For the conversion, the following exchange rates should be applied: • For the sale of goods or the provision of services, if the foreign currency is not sold in the month the tax liability arises, the average buying rate of commercial banks (as ascertained by the Bank of Thailand) for the last working day of the month in which the liability arises. Apart from that it is the exchange rate realised on the sale of the foreign currency. • For imports, an exchange rate as adopted by the Customs Department for collection of import duty.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.
Invoices	Is a business required to issue tax invoices?	Yes. A business must issue a tax invoice on the sale of goods or the provision of services and a duplicate must be kept as a reference.
	Is it possible / mandatory to issue invoices electronically?	Yes.
	Is it possible to issue recipient created tax invoices?	No.

Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	In general, the Revenue Department conducts general tax investigations (i.e. tax audits) once a year. The revenue officers will inspect general matters (e.g. business operations, tax filings, tax payments, record keeping). In addition to general tax investigations, the Revenue Department may conduct specific tax investigations if the authority suspects that there may be tax evasion. If a VAT refund is requested, a tax audit will be conducted before the tax is refunded.
	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	No.
	What penalties can arise from non-compliance?	For failure to file a tax return or for errors in a tax return affecting output or input taxes, penalties generally range from one to two times the amount of tax payable plus a surcharge of 1.5 percent per month of tax payable exclusive of penalties. Other penalties for minor offenses (e.g. failure to give notice of an address change to the Revenue Department) result in a fine not exceeding THB5,000, one month imprisonment or both. In general, the penalty for major offenses (e.g. intentionally issuing a tax invoice without the right to do so), is a fine ranging from THB10,000 to THB200,000, a term of imprisonment ranging six months to seven years, or both.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	No.
	Does a reverse charge mechanism apply?	Yes.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Yes. VAT exemptions are granted to certain transactions (e.g. the transfers of partial/entire businesses).
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes
	Are rulings and decisions issued by the tax authorities publicly available in your country?	Yes.
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • specific Business Tax • Customs duty • Excise duty • Stamp duty • House and Land tax, Local Maintenance tax and Signboard tax.

Vietnam

General	Types of indirect taxes (VAT/GST and other indirect taxes)	VAT
	What is the standard VAT/GST rate?	10 percent
	Are there any reduced rates, zero rates or exemptions?	Yes. The reduced rates are as follows: • zero percent - goods and services exported or sold to non-tariff zone, etc. • five percent - 15 categories of goods and services, including fertilisers, fresh foodstuffs, specialised medical equipment, public cultural training, and scientific and technological services, etc. Twenty-six categories of VAT exempt supplies include products of cultivation, aquaculture or fishing, life insurance, financial, medical, public postal or telecommunication services, education and vocational training, publication, and public passenger transportation, etc.
Registration	Who is required to register for VAT/GST?	Organisations and individuals: • producing and trading VAT taxable goods and services in Vietnam, irrespective of the line, form or organisation of business • importing VAT taxable goods or purchasing VAT taxable services from overseas.
	Is voluntary VAT/GST registration possible for an overseas company (e.g. if the annual turnover is below the relevant VAT/GST registration threshold)?	Yes. For Foreign Contractor Withholding tax ("FCT") i.e. comprising of Corporate Income Tax and VAT purposes, an overseas company can register to pay VAT either under the tax credit method (i.e. output less input) or deemed value added method. The overseas company can register under the tax credit method if all of the following apply: • it has a permanent establishment in Vietnam • the period of conducting business in Vietnam pursuant to the contract is 183 days or more • it adopts the Vietnamese Accounting System. Note: This applies only to foreign contractors who have a contract with a Vietnamese entity and is regulated under the withholding tax regulations. A foreign entity cannot register merely for the purpose of claiming refunds.
	Does an overseas company need to appoint a fiscal representative?	Under the deemed value added method, the payer (i.e. the Vietnamese contracting party) is required to register for VAT, calculate the deemed VAT payable based on specific value added bases and pay VAT to the tax authorities on behalf of the overseas company, before making any payment to the overseas company.

Registration (continued)	Is VAT/GST grouping possible?	VAT grouping is applicable between a head office and its branches in specific cases, i.e. branches conducting business in the province or city where their head office is located, or branches conducting business outside the province or city where their head office is located but they do not directly sell goods and have no sale turnover. Grouping for related party or associated entities is not permitted.
Compliance	How frequently are VAT/GST returns submitted?	In general: • monthly VAT returns shall be lodged no later than the 20th of the following month under the tax credit method • annual declaration of modification shall be made for enterprises adopting the creditable method in case the recalculated creditable VAT amount of the year based on the proportion of turnover of sold VAT-liable goods and services to the total turnover of goods and services sold in the year is different from the total amount declared in the year. For overseas companies: • provisional VAT returns to be lodged by the payer within 10 days from the date of making overseas payment under the deemed value added method • VAT finalisation returns to be lodged by the payer within 45 days from end of the contract under the deemed value added method.
	What are the exchange rate rules in your country?	Turnover in foreign currency shall be converted into Vietnamese Dong (VND) at the inter-bank exchange rate published by the State Bank of Vietnam at the time when the turnover arises.
Recovery	Can an overseas company recover VAT/GST if it is not registered for VAT/GST locally?	No.
Invoices	Is a business required to issue tax invoices?	Yes.
	Is it possible / mandatory to issue invoices electronically?	Yes. Electronic invoices are permitted under the current regulations. However, the electronic invoicing has yet to be implemented in Vietnam. Other common forms of invoices are self-printed invoice and invoices printed by authorised printing houses or tax authorities.
	Is it possible to issue recipient created tax invoices?	Yes, provided the tax invoice is registered with tax authorities.
Audits	Do tax audits take place on a regular basis? Please specify how often, what is checked in terms of an overview and the competent authority for it.	Under the Law on tax administration, tax audit shall be conducted: • on a regular basis no more than once a year for enterprises with diversified business lines and a wide scope of business • when there is a sign of tax law violation • to settle complaints or denunciations or upon request of heads of tax administration agencies at all levels

Audits (continued)	Are there audits done electronically in your country (E-Audit)? If so, what system is in use?	None at this moment.
	What penalties can arise from non-compliance?	For every act of tax-law violation, the violating individuals or organisations are liable to one of the following sanctioning forms: • Caution: is decided in writing and applied to first-time violations or second-time violations involving extenuating circumstances, for less serious violations of tax procedures. • Fine: is specified for every act of tax-law violation as follows: • fine with an absolute sum of money for acts of violating the tax procedures with the maximum fine level of VND100 million • a fine of 0.05 percent of the late paid tax amount each day, for acts of delayed payment of tax or fine • a fine of 10 percent of the outstanding tax amount, for acts of making false declarations which lead to lower payable tax amount or higher refunded tax amount • a fine equal to one to three times the evaded tax amount, for acts of tax evasion or tax fraud.
Special indirect tax rules	Are there unique country specific indirect tax rules that differ from "standard" indirect tax rules in other jurisdictions?	Export processing enterprises are not subject to the VAT regime. Export services are (effectively) not zero-rated.
	Does a reverse charge mechanism apply?	Yes, under the deemed VAT taxation of Foreign Contractor Tax.
	Are there indirect tax incentives available (e.g. reduced rates, tax holidays)?	Yes, a company is entitled to indirect tax incentives when exempted from import duties, in accordance with laws and regulations on import and export duty.
Rulings	Is it possible to apply for formal or informal advance rulings from the tax authority?	Yes, formal rulings can be sought through the local/provincial tax department. Any issue requiring an internal approval will be escalated to higher authorities to resolve.
	Are rulings and decisions issued by the tax authorities publicly available in your country? If so, please provide us with the link to the database	Official rulings and decisions issued by the tax authorities are publicly available on the official website: http://www.gdt.gov.vn/gdtLive/Trang-chu/Van-ban-huong-dan-ve-thue
Other indirect taxes	Are there other indirect taxes not commented on above?	Yes, other indirect taxes include: • special sales tax • import and export duties.

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