







FISCAL ISSUES FOR NATIONAL BUDGET 2025–2026 TO FOSTER ECONOMIC AND BUSINESS GROWTH



Table of contents







- Key numbers for 2025-26
- How tax and VAT net can be increased? Short terms measures
- How tax and VAT net can be increased? Mid and long term measures
- Fundamentals to be addressed (Neutrality, Efficiency, Effectiveness & Fairness, Flexibility, Certainty & Simplicity)
- Expectation on Income Tax
- Expectation on VAT
- Expectation on Customs

Key numbers for 2025-26









- 1	٠			•	C	Tr_1	
-	١m	OH:	nт	ın	ı.r	Tal	Κ.
•	***	U U	110		O.	Iu	L

Particulars	2024-25	2023-2024
Original Target	480,000	450,000
Revised Target	463,500	410,000
Actual Revenue from July to March	256,486	249,592
Actual Revenue from July to June		383,000
Expected Collection		
(Same amount in 3m of last year)	389,894	
Expected Deficit	(73,606)	

It was 259,958 as per Mar 24 NBR statistics

Target for 2025-26 Growth

499,000 28%

How tax and VAT net can be increased? - Short terms measures









- ✓ Partner with Local government (City Corporation, Pourasava) and ensure submission of PSR. Bring similar provision in the VAT Act 2012.
- ✓ Advertising campaigns on digital platforms like Facebook and YouTube
- ✓ Establishing strong collaboration with market committees on tax and VAT compliances.
- ✓ Comparative report based on each circle showing registered taxpayers and return filings. Coordination and integration of circle-based reports. Encouraging non-filing taxpayers through SMS to submit returns
- ✓ Making online income tax return filing mandatory for all Personnel taxpayers. Bring CIT online too!
- ✓ Assess performance of tax and VAT official excluding Tax and VAT paid by assessee (92% IT is paid by assessee)
- ✓ Allocate budget (500 crore) for cash back to consumers instead of Lottery.

How the tax net can be expanded? - FICCI CA PROPERTY CAN BE REAL OF THE CAN BE REAL OF TH Mid and Long term







- ✓ Inclusion of the basic concept of the tax system in the national curriculum can raise awareness among students about civic responsibility and the importance of taxes
- > Collaborate with local government and security agency so that one does business with valid license only.
- ➤ It should be mandatory to provide e-TIN/NID information on the receipt of holding tax payment and during the land revenue payment process.
- > City corporations and other government agencies should send e-TIN/NID-based asset information to the National Board of Revenue.
- > In the long term, integration (inter-connection) should be done through API.
- > Integrating private online tax return filing companies with the National Board of Revenue's online system

Reducing the size of the informal economy and expanding the size of the formal economy.

To foster a cashless economy, the National Board of Revenue (NBR) needs to collaborate with Bangladesh Bank and invest in technological infrastructure. A Unified Payment Interface (UPI) should be established to facilitate seamless transactions across banks and MFS on a single platform, and digital transaction fees should be minimized.

Key enablers towards SMART Tax







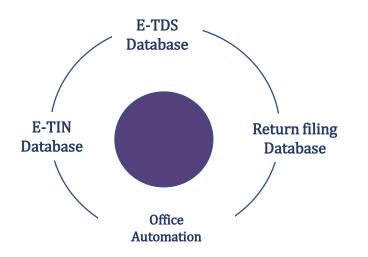
National Board of Revenue, Bangladesh

জাতীয় রাজস্ব বোর্ড, বাংলাদেশ



Environment

- NBR already started the Journey in its automation
- Inter and Intra Integration is the next phase of Automation
 - Simplify and increase transparency in tax processes.
 - Streamline tax administration and foster stakeholder collaboration.















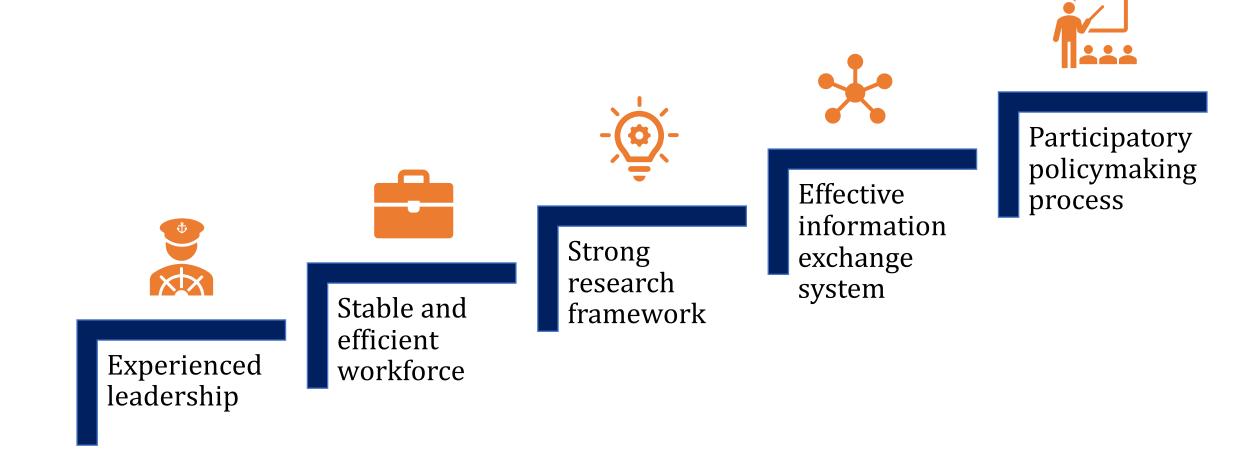
Effective separation of Policy vs Administration











Tax expenditure and sunset clause







Source of Tax	Exemption rate on GDP of the relevant fiscal year (%)
Income Tax (2020-2021)	3.28%
VAT & SD (2021-2022)	3.26%
Customs and Excise Duty (2021-2022)	0.71%

- > Set out Tax Expenditure policy. There must be something for FDI.
- > Exemptions only be granted by the parliament/advisory committee
- ➤ Time limit for all tax exemptions (currently, a time limit applies to high-tech parks and economic zones)
- ➤ New industrial establishments must be established to obtain exemption (currently, this condition applies to high-tech parks and economic zones)

Industry Research









Industry vs contribution		UBL	Others		
Soap (Bar	Market share (*)	53%	47%		
and Liquid)	VAT on Sales (Taka in Cr)	199	176		Are we
Detergent	Market share (*)	66%	34%		getting
powder	VAT on Sales (Taka in Cr)	270	139		these?
Industry vs contribution		LH	Others		
Cement	Market share (**)	7.18%	92.82%		
	VAT on Sales (Taka in Cr)_2024	360	5,019		
Industry vs contribution		Metlife	Others		
Insurance	Market share (GWP) (***)	27.08	72.92		
	Income tax (Taka in Cr)_2022	238	643	/	

^{*} Luminaries Research Ltd. https://luminariesresearch.com

^{**} BCMA ***Annual accounts and IDRA

Analysis of the Overall Impact on **Revenue Income Before Formulating Tax Rate Policy**

Minimum Income Tax (0.6%) / (3%)

Total Revenue Income of NBR

Income Tax Liability



270

270

4,208





210

-228



Particulars	0.6% Minimum Tax`	3% Minimum Tax	Impact
Selling Price	100	120	
Selling Units	100	75	
Revenue	10,000	9,000	
VAT & Supplementary Duty (43%)	4,375	3,938	-438
Profit before Tax	200	180	
Income Tax @ 27.5%	55	50	

Although NBR's income tax has increased by Tk. 210, the overall revenue has decreased by Tk. 228.

60

60

4,435

Discrimination between Govt. & non-Govt. employee









Govt. Employee

Particulars	Taxable/non- taxable
Basic Salary	Taxable
Bonus & Festival Bonus	Taxable
Perquisites	non-taxable
GPF, Pension Fund	non-taxable

Non-Govt. Employee

Particulars	Taxable/non- taxable
Basic Salary	Taxable
Bonus & Festival Bonus	Taxable
Perquisites	Taxable
PF, GF, WPPF, Pension Fund	Taxable

The tax structure is contributing to income inequality between government and non-government employees due to varying tax benefits.

Prospective Tax Law







Description	Previous			New			
Description	Introduced in	Effective from	Impact	Introduced in	Effective from	Impact	
Income Tax rates for individual, companies and other than companies	FB 2023	AY 2023-2024	Retrospectively	FB 2024	AY 2024-2025 AY 2025-2026	Retrospectively Prospectively	•
WHT rates	FB 2023	AY 2024-2025	Prospectively	FB 2024	AY 2025-2026	Prospectively	
Provision of ITA 2023							
Consideration of AIT at the import stage as a minimum tax [Section 163(3)]	FB 2023	AY 2023-2024	Retrospectively	FB 2024	AY 2024-2025	Retrospectively	



Risk Based tax and VAT Audit









Tax and VAT audit process is mostly conducted randomly, which creates an unnecessary burden on certain taxpayers and increases the administrative costs for businesses.

Risk Based Audit Methodology should be adopted and automated process should be intriduced

Setting tier by tier import duties and FICE CA PRODUCTION OF THE P









imposing minimum import duties for domestic producers

To analyse demand of goods vs current production capacity to protect local industry.



1%-3%

For manufacturing organizations for import of raw materials and capital goods



Quantity-based mixed duty on listed products where necessary (e.g. food grains, vehicles, iron and steel, electricity and fuel, gold, etc.)



5% - 7%

on imported raw materials for domestically produced machinery and parts



25%

for products that can be consumed or used directly without any changes

High Total Tax Incidence









Cashless and IPO condition



Increase of ETR due to inadmissibility



Rationalization of TDS and Gradually Withdraw 163



Business burdensome with TDS and PSR



Restrictions on Setting-off Losses



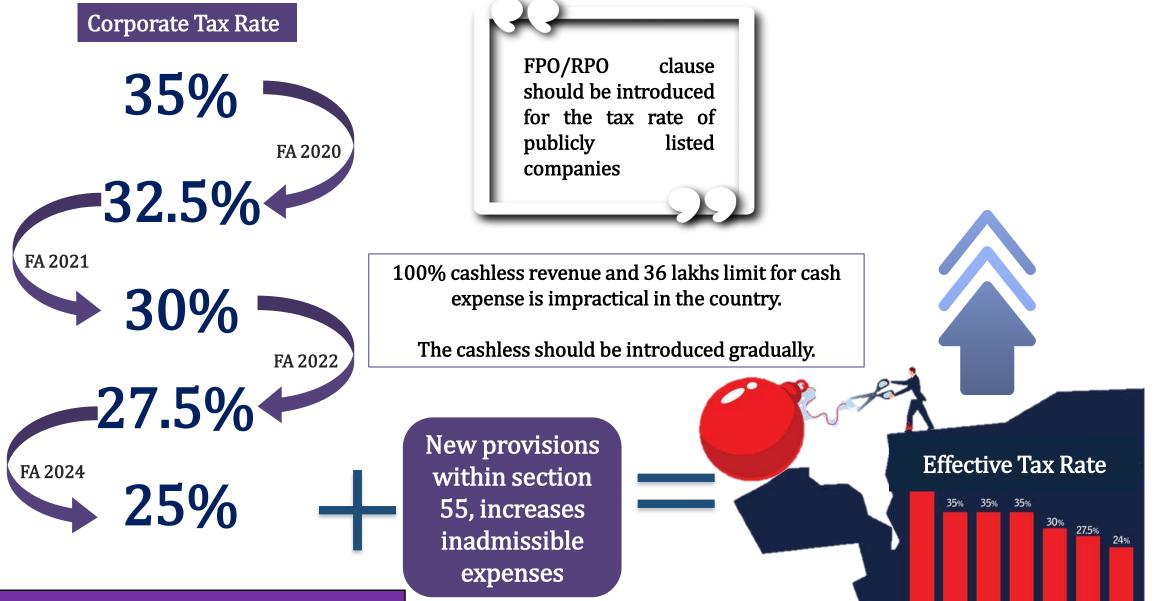
Increase of ETR due to cashless/IPO condition











Increase of ETR due to inadmissibility







There are 12 (Twelve) items in the negative list

Provision	Current
Excess perquisite	Tk 1,000,000
Head office expenses	10% of PBT
Royalty	10% of PBT
Promotional Expenses	0.5% of turnover
Provision for Bad Debts	None
Disallowed expenditure	55

Rationalization of TDS and Gradually Withdraw 163







Service Provider



ITA, 2023 includes various provisions of TDS from sections 89-151

AY 2024-2025	Rate
For the supply of raw materials used in industrial production	3%
-	5%
In all other cases	
mentioned in section 89	
except the table	

Import & Supply of goods				
Particulars	(Amount in Cr)			
	Actual Income	Deemed Income		
Source tax	5	5		
Revenue	100	100		
Profit	15	20		
Tax @25%	3.75	5		
Effective tax rate		33.3%		

JCI VIC	c i i ovidci		
Particulars	(Amount in Cr)		
	Actual Income	Deemed Income	
Source tax	10	10	
Revenue	100	100	
Profit	20	40	
Tax @25%	5	10	
Effective tax rate		50%	

Proposed to amend

Section 89: 2% to 3%

Section 90: 7.5%

Section 120: 5% to 3%

Actual Business income of Tk. 15 crore becomes Tk. 20 crore to trade off the impact of source tax

Actual Business income of Tk. 20 crore becomes Tk. 40 crore to trade off the impact of source tax

Rationalization of TDS and Gradually FICCI Withdraw 163









TDS from Income of Non-residents

Particulars	Current Rates	Proposed Rates
Advising or Consultancy Service	20%	10% to 15%
Professional Service, Technical Service, Technical Know-how, Technical Support Service	20%	10% to 15%
Architecture, Interior Design, Fashion Design, Process Design	20%	10% to 15%
Management Service including Event Management	20%	10% to 15%
Advertisement Broadcasting	20%	10% to 15%
Preparing Advertisement or Digital Marketing Broadcasting	20%	10% to 15%

Bangladesh's high tax rates for non-resident companies, significantly exceeding those of Asian and OECD nations, discourage foreign investment (FDI), hindering economic growth and technological advancement.

Business burdensome with TDS and PSR









Payer Deducts tax and deposit to the Govt. Exchequer

Payer Submit withholding return

Payer need to collect PSR. TDS will increase due to lack of PSR



Now a company will be required to collect PSR from eight categories of supplier and service providers failing to which expenses will be disallowed for the lack of PSR. It will be a double blow for a company

(ণ) ধারা ২৬৪ এর উপ-ধারা (৩) এর দফা ২৫, ২৬, ২৮, ২৯, ৩৬, ৩৭, ৪২ ও ৪৩ অনুযায়ী রিটার্ন দাখিলের প্রমাণ দাখিলে বাধ্য এইরূপ কোনো ব্যক্তিকে পরিশোধিত কোনো অঞ্জ, যদি অর্থ পরিশোধের সময় উক্ত ব্যক্তি রিটার্ন দাখিলের প্রমাণ দাখিলে ব্যর্থ হয়;

Restrictions on Setting-off Losses FICCI CANDIDORNAL SECTION OF SE







Particulars	ITO 1984	ITA 2023
Income from business	(500,000)	(500,000)
Other Income	700,000	700,000
Taxable Income	200,000	700,000
Net Tax Payable @ 25%	50,000	175,000
Additional tax payment in current Year		125,000
Carry forward business loss	-	(500,000)

Increasing tax burden of loss making companies ie: loss-making companies will still have to pay taxes on interest income, dividend income, etc

Amendments Turning Us Back To Origin FICCI









Original version of VAT & SD Act, 2012



No Price declaration



No specific definition of input



Net VAT payable



No VDS amongst BTB



Easy VAT return

New Addition in VAT & SD Act, 2012

Introduced Mushak 4.3

Introduced definition of input

VDS need to be paid separately

Long list of VDS

Complicated VAT return

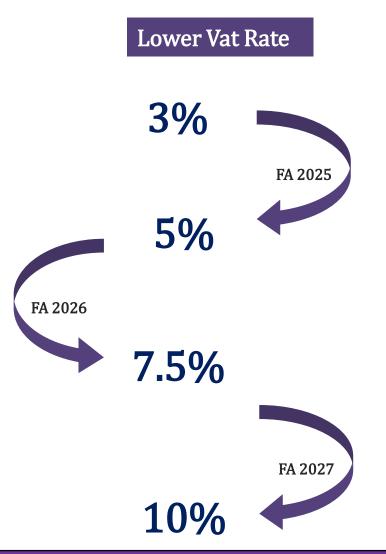
Graduation to Single VAT Rate

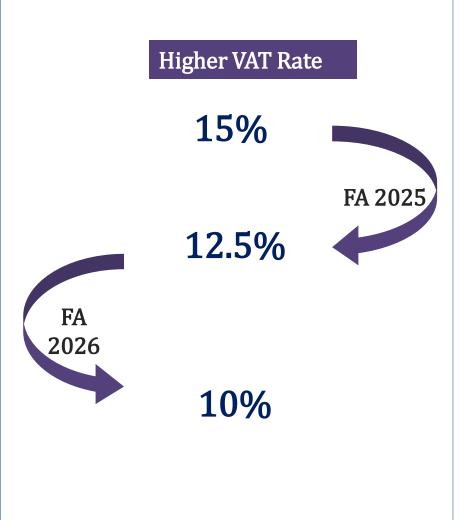


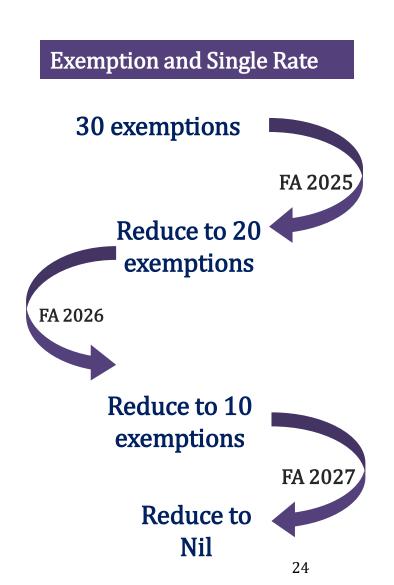












Gradually reduce negative list of inputs FICE CA STREET CAN STREET

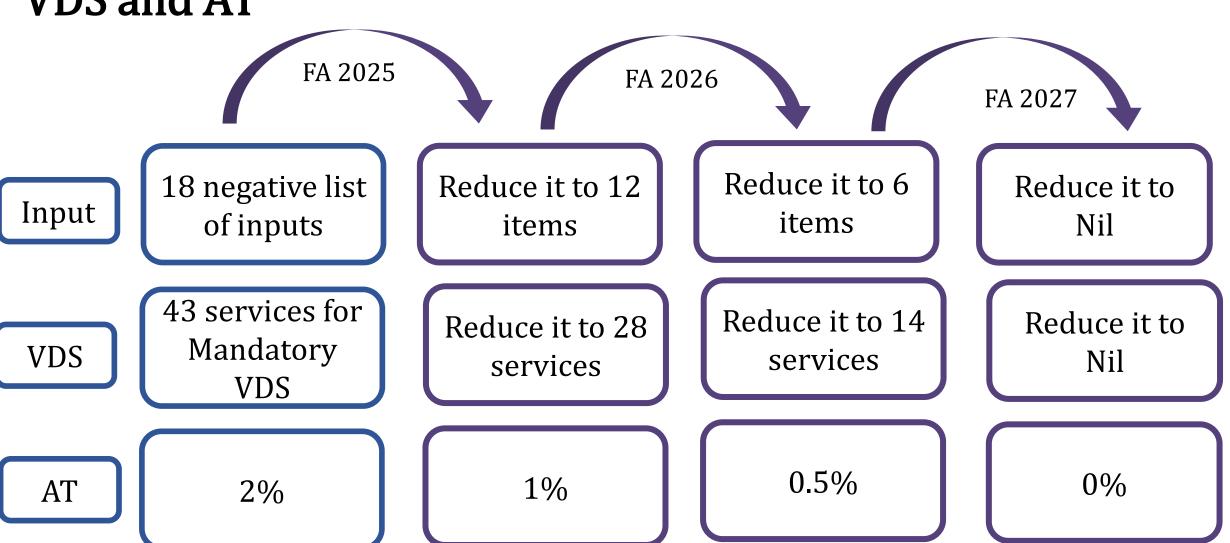












Exemption from VAT forms and







accounting books, and simplification of forms and accounting books.

If a registered and listed person maintains accounting books and prepares financial statements in accordance with IAS and IFRS, they will not be required to submit a inputoutput coefficient (Mushak-4.3) separately. Furthermore, they will not need to maintain purchase books, sales books, and purchase-sales books.

However, all registered and listed persons who do not maintain accounting books and do not prepare financial statements according to IAS and IFRS will be required to submit the materials-output coefficient. They must also maintain books as per the current laws and regulations.

Since the forms and books are complex, the new VAT forms 4.3, 6.1, 6.2, and 6.2.1 have been included.

Customs procedure simplification









- The following digital modules within the ASYCUDA system should be integrated (coordinated) and made self-sufficient within one year:
 - □ Documents Verification system through digital Integration with key Regulators and Facilitators,
 - ☐ Customs Valuation Management Module,
 - ☐ Modern Risk Management Module,
 - ☐ Litigation Module,
 - ☐ Auction Module
- Full fledged implementation of NSW project
- Current status of the key recommendations of TRS 2022
- Periodic TRS study to assess the current position and benchmarking
- Effective implementation of valuation Rules 2000



Presenter's Profile



Snehasish Barua, FCA

Partner, Snehasish Mahmud & Co Chartered Accountants snehasish@smac-bd.com +8801819319319