



HKICPA seminar:

How does the Tax Regime on Qualifying Corporate Treasury Centres Operate?

Program Code: SCPD17012301

The new tax legislation on corporate treasury centre ("CTC") (The Inland Revenue (Amendment) (No. 2) Ordinance 2016) was gazetted on 3 June 2016. The legislation offers a concessionary tax rate for qualifying profits derived by a CTC in Hong Kong and relaxes the tax deduction for interest expenses in certain circumstances. That said, the legislation also contains some controversial profits tax treatment for interest income and other profits derived from an intra-group financing business. To clarify the interpretation and application of the new legislation, the Inland Revenue Department further issued Departmental Interpretation and Practice Notes No. 52 – Taxation of Corporate Treasury Activity ("DIPN 52") in September 2016. This seminar will discuss the key messages of DIPN 52 and its implications to intra-group financing businesses. The speaker will also share his practical experience on how the CTC tax regime could potentially benefit an organization.

This seminar will cover the following topics:

- Overview of the CTC tax regime and the new profits tax treatments for interest income and interest expense for an intra-group financing business
- Highlights of DIPN 52 and its key implications to intra-group financing businesses
- Case sharing on how the CTC tax regime could work

Date **Monday, 23 January 2017**

Time **7:00 p.m. – 8:30 p.m.**

Venue Hong Kong Institute of CPAs,
27/F., Wu Chung House, 213 Queen's Road East, Wanchai, Hong Kong

Format Seminar

Language Cantonese

Fee HKICPA member or student: HK\$190 (online enrolment: HK\$180)
IA/ HKIAAT member or student: HK\$190
Non-member: HK\$330

Speaker **Mr. Charles Chan**, Director, Tax services, PricewaterhouseCoopers ("PwC")
Mr. Chan is a director in the Corporate Tax group of PwC Hong Kong. He has over 13 years of experience in providing tax consulting services to local, regional, multi-national and listed companies. He also has experience working as an assistant assessor in the Profits Tax Section of the Hong Kong Inland Revenue Department ("IRD").

Over the years, Mr. Chan has been assisting many clients to handle different types of tax disputes with the IRD. He also has extensive experience in providing international tax consultation to his clients as well as involvement in tax planning and tax structuring work for companies with cross-border transactions. Mr. Chan has involved in many business advisory projects including merger and acquisitions and the set up of efficient corporate holding and operational structure for his clients.

Participants CEOs; CFOs; Tax directors; Treasury and trade directors; Business development directors

Competency* Taxation

Rating* Intermediate level

CPD hours 1.5

* Please refer to the [Institute's online CPD Learning Resource Centre](#) for descriptions of competency and rating.



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