

Hong Kong Institute of Certified Public Accountants 香港會計師公會

Conference



## Annual taxation conference 2019

Programme Code: CCPD19072001

### About the event

Date & Time	20 July 2019, Saturday	Schedule
	9:00 a.m. – 1:00 p.m.	09:00 - 09:05
	(Registration starts at 8:30 a.m.)	Opening remarks
Venue	Ballroom,	Mr. KK So
	InterContinental Hong Kong,	
	18 Salisbury Road, Kowloon,	09:05 - 10:05
	Hong Kong.	Recent changes in tax legislation, new
Fee	• Taxation Faculty member; HKICPA	departmental practice and proposed tax initiatives
	member or student; and IA/ HKIAAT's member or student: HK\$450	Mr. Brian Chiu Kwok-kit, JP
	Non-member: HK\$720	10:05 – 10:45
	Not a faculty member? Click <u>here</u> to join.	Hong Kong Board of Review decisions
Language	English	and court cases
		Mr. Michael Olesnicky
HKICPA	3.5 hours	
CPD credit	(subject to actual attendance)	10:45 - 11:15
Rating	Advanced Level*	Tea break
		11:15 - 12:45
Competency	Taxation*	Panel discussion –
		Contemporary transfer pricing issues in
Participant	Members working in the field of taxation	Hong Kong
	or with an interest in taxation	Moderator – Mr. KK So
Objective	To provide the latest updates on taxation	Panellists – Mr. Brian Chiu
		Mr. Patrick Cheung
Application deadline	7 working days before the date of the programme	Mr. Leonard Khaw
		Ms. Cecilia Lee
Geaunie	Programme	Mr. Michael Olesnicky
		With Wild Hadd Crootholky

\* Please refer here for descriptions of the various ratings.

12:45 - 12:55 Q&A

12:55 - 13:00 Closing remarks

Mr. Martin Richter





### About the speakers

### Brian Chiu Kwok-kit, JP Deputy Commissioner (Technical), Inland Revenue Department

Mr. Chiu is now the Deputy Commissioner (Technical) of the Hong Kong Inland Revenue Department. His present portfolio includes tax treaties, transfer pricing, tax appeals, technical research and advance ruling. He is the head of the Hong Kong delegation in a number of tax treaty negotiations, having overall responsibility of the work of the Tax Treaty Section.

He is currently engaged in the work relating to AEOI, BEPS and other technical legislative amendments (including ship leasing and insurance business). He is a member of ACCA, HKICPA, ICAEW, CPA(Aust) and TIHK.

### Patrick Cheung Partner, Global Transfer Pricing Services, KPMG

Patrick is a Partner in the firm's Hong Kong transfer pricing team and has more than 25 years of international tax experience of which over 20 of those working as a full time transfer pricing specialist.

Patrick has extensive experience in transfer pricing planning, compliance and controversy management for products, intangibles, services, financial transactions and regulatory issues. In addition to Hong Kong, he had also practiced transfer pricing in the United States, Canada and China.

Amongst Patrick's key clients are some of the world's biggest brand names in fashion, consumer and retail brands, industrial and automotive groups, high technology and pharmaceutical and science companies in the world. For these clients, he has helped designed, implemented and defended many transfer pricing models involving intangibles, principal structures, sourcing and purchasing structures involving multiple entities in the Americas, Europe and Asia. As such, Patrick is well versed in managing the needs of multiple stakeholders in these types of projects. His financial institution clients include major international commercial and investment banks, insurance and reinsurance companies as well as asset management firms.

### Leonard Khaw Co-leader, Managing Director – China Tax Services, Deloitte AP ICE, Ltd.

Leonard is the Co-leader of Deloitte's Asia Pacific International Core of Excellence (AP ICE), a group of senior tax professionals that provides international tax services to Asia Pacific-based companies investing abroad, as well as multinational companies investing in the region.

Leonard is an international and M&A tax partner based in Hong Kong. He is also a Deputy Managing Partner of the Deloitte China Tax & Legal Services practice, and leads the Deloitte China Japanese Services Tax Group.

Leonard has more than 35 years' experience as a practicing tax professional in Australia, China, Hong Kong, Indonesia and the UK.





### About the speakers (cont.)

### Cecilia Lee

# Member, Institute's Taxation Faculty China Tax Sub-committee, and Partner, Tax Services, Transfer Pricing Services, PwC

Cecilia has been at PwC for over 20 years, with over 10 years experience in the United States. She is the head of PwC's transfer pricing practice in Hong Kong and is also the Asia Pacific Partner for PwC's Global Coordinated Documentation service. Cecilia advises clients on various Hong Kong and China transfer pricing issues, including value chain transformation, cost sharing, restructuring, intangible property and audit defence and disputes.

### Michael Olesnicky Senior Consultant, Tax, Baker & McKenzie

Michael is a senior consultant based in Baker McKenzie's Hong Kong office. He had served as the Asia Pacific Chair of the Tax Practice from 2000 to 2014, and was a member of the Global Tax Steering Committee. He has more than 25 years' experience advising on corporate tax, wealth management, trust planning and estate succession matters. His practice focuses on Hong Kong and Asian regional tax advisory work, tax disputes and litigation, as well as wealth management and estate planning.

### **Martin Richter**

### Partner, International Tax Services – Transfer Pricing, EY

Martin is the Partner in charge of EY's transfer pricing practice in Hong Kong, advising clients in both Hong Kong and Mainland China. Martin is based in Hong Kong and has 19 years of transfer pricing experience, gained from Big 4 practices in London, Washington DC, and Hong Kong. Martin advises on a full range of different transfer pricing project types, including policy design and implementation, tax aligned restructurings, audit defense, advanced pricing agreements, as well as general compliance and documentation. He has deep experience in advising on a multitude of intercompany transaction types, including establishing and supporting unit prices for tangible goods; fees for services; royalties / licenses / franchises for intangibles; and financing costs for financial transactions.

### **Chair and Moderator**

#### KK So

Chair, Institute's Taxation Faculty Executive Committee, and Partner - Tax Services, PwC

### Registration

• Complete online registration 7 working days before the date of the programme.