

Transfer pricing DIPN series – DIPN 59 : Transfer pricing between associated persons – Part 2

Programme Code: SCPD19102301

About the topic

The Inland Revenue Department (IRD) published the three long-awaited Departmental Interpretation and Practice Notes (DIPNs) on 19 July 2019. DIPN 59 summarized the IRD's views on transfer pricing arrangements between associated persons.

In this seminar, the speakers will cover the following topics in DIPN 59:

- alignment of transfer pricing (TP) rule 1 and Organisation for Economic Co-operation and Development (OECD) TP guidelines;
- relationship between transfer pricing and locality of profits;
- IRD's right to re-characterize related party transactions
- exempted Domestic transactions; and
- grandfathered transactions

Relevant examples in the DIPNs will be used to illustrate the concepts.

About the event

Date & Time	23 October 2019, Wednesday 7:00 – 8:30 pm
Venue	The Hong Kong General Chamber of Commerce 22/F., United Centre, 95 Queensway, Hong Kong
Fee	<ul style="list-style-type: none"> • Taxation Faculty member: HK\$120 • HKICPA member or student; and IA/ HKIAAT's member or student: HK\$150 • Non-member: HK\$330 <p><i>Not a faculty member? Click here to join.</i></p>
Language	English
HKICPA CPD credit	1.5 hour (subject to actual attendance)
Rating	Advanced level*
Competency	Taxation*
Participant	Tax practitioners, CEO, CFO, COO, financial controllers
Application deadline	20 October 2019

Speaker

Patrick Cheung

Partner, Global Transfer Pricing Services, KPMG

Irene Lee

Partner, Global Transfer Pricing Services, KPMG

Chair

Eugene Yeung

Director, Corporate Tax Advisory, KPMG

* Please refer [here](#) for descriptions of the various ratings.



About the speakers

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.

Irene Lee

Partner, Global Transfer Pricing Services, KPMG

Irene is a Partner of KPMG's Global Transfer Pricing Services group for Hong Kong and has more than 13 years' experience working as a full time transfer pricing specialist.

Irene has worked on a variety of TP clients and dealt with their TP issues in the past years. She has assisted various major international clients in managing, planning and documenting their TP policies in China, Hong Kong and across Asia-Pacific.

Irene also spends much time in providing regional TP consulting and planning advices to a wide range of business activities in the areas of investment banking, insurance and securities trading, sales and distribution of goods and advising clients on potential TP risks and opportunities. She has also conducted TP planning / review in relation to royalties for intellectual properties and similar related projects.

Registration

- Complete online registration [by 20 October 2019](#).

Contact Ms. Betsy Liang at 2287 7009 for enquiry.



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