

Is it still possible to claim offshore in Hong Kong?

Programme Code: SCPD20011001

About the topic

Hong Kong has adopted the territorial principle of taxation such that only Hong Kong sourced profits should be liable to tax in Hong Kong. With the recent changes in the global tax landscape and the codification of the Base Erosion and Profit Shifting (BEPS) and enactment of Transfer Pricing (TP) law in Hong Kong, it appears that the Inland Revenue Department (IRD) has been more closely scrutinising offshore claims on various types of income.

In this seminar, the speakers will share with you:

- the latest development of the IRD's approach in assessing the offshore income;
- how to handle the IRD's enquiries tactfully and precaution measures to avoid potential tax disputes;
- case sharing; and
- a light touch on the BEPS 2.0 implications.

About the event

| | |
|-----------------------------|---|
| Date & Time | 10 January 2020, Friday 7:00 – 8:30 pm |
| Venue | HKICPA training centre, 27th Floor, Wu Chung House, 213 Queen's Road East, Wanchai |
| 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 <i>Not a faculty member? Click here to join.</i> |
| Language | Cantonese |
| HKICPA CPD credit | 1.5 hour (subject to actual attendance) |
| Rating | Advanced level* |
| Competency | Taxation* |
| Application deadline | 7 January 2020 |

Speakers

Charles Chan
Tax Services Partner, PwC

Philip Hung
Director, Tax Controversy
Services, PwC

Chair

Wengee Poon
Transfer Pricing Partner, PwC

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



About the speakers

Charles Chan

Tax Services Partner, PwC

Charles Chan is a Partner in the Corporate Tax group of PricewaterhouseCoopers, Hong Kong. He has rich experience in providing tax consulting services to local, regional, multi-national and listed companies. Charles also has experience working as an Assistant Assessor in the Profits Tax Section of the Hong Kong Inland Revenue Department (IRD).

Charles has been providing tax consulting services to clients in different industries such as retail and consumer product, telecommunication, technology, shipping and logistic, natural resources, trading etc.

Over the years, Charles has been providing solutions to stated owned enterprises, private and listed companies as well as individuals and also assisting them to handle different types of tax disputes with the IRD. Charles 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. He has been involved in many business advisory projects including merger and acquisitions and the set-up of efficient corporate holding and operational structure for his clients.

Charles holds a Bachelor of Business Administration degree (major in Accounting and Finance) from the University of Hong Kong. Besides, he is a member of HKICPA and ACCA. He is a regular speakers of tax seminars and events.

Philip Hung

Director, Tax Controversy Services, PwC

Philip is a Director in PricewaterhouseCoopers Ltd. He has over thirty five years' experience in Hong Kong taxation with six years in IRD. He is a well-known expert in the tax field and investigation specialty. After he left the IRD, Philip concentrated in assisting clients in handling tax investigation and field audit cases. Philip is the first to set up a specialized team to handle the IRD's tax investigation and field audit cases for clients in the industry. His clients include SME, listed companies and various MNC, involving complicated cases such as worldwide onshore/offshore claim, disputes on contracting processing and import processing arrangements, transfer pricing adjustments, etc.

Philip is a regular speaker on tax audit and frequently contributes newspaper and magazines articles on the related topics.

Registration

- Complete online registration [by 7 January 2020](#). **Contact Stone Tse at 2287 7065 for enquiry.**



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Deadline: 7 January 2020

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* Email address is for enrolment confirmation purpose. Please refer to note (2) for details.

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- Notes:**
- Membership Status: **TF** = Taxation Faculty member, **NP** = Non-Practising, **P** = Practising, **IA** = International Affiliate, **S** = Student, **HKIAAT** = HKIAAT Student or Member, **GAA** = GAA Passport holder, **NM** = Non-Member.
 - Successful applicants will receive confirmation of registration by email. Unsuccessful applicants will also be notified. If you have not heard from the Institute regarding your registration by 7 January 2020 and if you have other enquiries related to the programme, please make enquiry at 2287 7065.
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 - The Institute reserves the right to change the venue, date, speaker or to cancel the event due to unforeseen circumstances.
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