

E-seminar:

Programme Code: ESEMTF202007

Revised DIPN 39 - Digital economy, electronic commerce and digital assets

About the topic

In response to the rapid changing ways of doing business in an increasing digitalized economy, the Inland Revenue Department ("IRD") issued the Revised DIPN 39 in March 2020 to provide more guidance on its view on taxation on digital businesses.

Under the Revised DIPN 39, a non-Hong Kong resident enterprise merely maintaining a server in Hong Kong, without the involvement of human activities in Hong Kong, may be considered as having a server PE and liable to tax in Hong Kong. The Revised DIPN 39 also covers the tax treatment of digital assets, including the tax position of an issuer in an Initial Coin Offering ("ICO").

In the seminar, the speakers will walk you through the following questions/issues:

- Would maintaining a datacenter or server alone render a non-Hong Kong resident enterprise exposed to Hong Kong profits tax?
- When will a place/computer equipment constitute a PE?
- When will a Hong Kong taxpayer be required to withhold tax for payments made to a non-Hong Kong resident?
- How does source/territorial concepts apply to a digital business in light of the new rules?
- The potential application of anti-fragmentation in the context of dependent agent PE?
- What is the tax treatment of proceeds from an ICO?

[Click here](#) for more events by Taxation Faculty

About the event

Available period	9 Jun 2020 – 8 Jun 2021
Format	E-seminar
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 hours (subject to actual attendance)
Rating	Advanced level*
Competency	Taxation*
Application deadline	Online registration by 8 Jun 2021 (offline registration by 4 Jun 2021)

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

Speakers

Jo-An Yee

Member of Taxation Faculty Executive Committee, and Technology, Media, Telecommunications tax leader - HK, International tax & transaction tax services partner, Ernst & Young Tax Services Limited

Kathy Kun

Senior Manager, National Tax Centre, Tax & Business Advisory Services, Ernst & Young Tax Services Limited

Chair

Eric Chiang

Deputy Director, Advocacy & Practice Development, HKICPA



About the speakers

Jo-An Yee

Member of Taxation Faculty Executive Committee, Technology, Media, Telecommunications tax leader - HK, International tax & transaction tax services partner, Ernst & Young Tax Services Limited

Jo An is a Hong Kong tax partner in Ernst & Young ("EY") specialising in the technology and telecommunication areas and has over 20 years of practical experience in providing tax advisory and compliance services clients. She is currently the Technology, Media & Telecommunications Tax Leader for Hong Kong/Macau and principal key contact for Asia Pacific technology sector - tax.

Jo An has worked on major telecom and technology accounts and has been actively engaged by well-known companies in their fields on their industry-specific tax issues for digital business such as cloud computing, apps, mobile gaming and online marketplace.

Jo An was the co-author of several publications. In particular, besides her involvement with CCH and Ernst & Young for "The Hands of Guide of Tax Compliance in Hong Kong", her publications include the thought leadership paper published by Ernst & Young "Talking tax – Telecom transactions in emerging and mature markets" and "Tax considerations in Cloud Computing".

Kathy Kun

Senior Manager, National Tax Centre, Tax & Business Advisory Services, Ernst & Young Tax Services Limited

Kathy is a Senior Manager of the National Tax Centre of EY with over 15 years of experience. She is responsible for developing and updating tax training materials, as well as conducting internal tax training courses. She is a frequent speaker at tax seminars and is one of the authors of the Firm's tax client publications.