

E-seminar:

Programme Code: ESEMTF202023

# The Taxation of Offshore Indirect Transfers

## About the topic

Offshore indirect transfer (OIT) refers to "disposition of an indirect ownership interest in an asset, in whole or in part, in which the transferor of the indirect interest is resident in a different country from that in which the asset in question is located" has emerged as a significant issue in many developing countries as failure to collect tax on OIT could represent major tax leakages to these countries.

The Platform for Collaboration on Tax (PCT), co-founded by the IMF, OECD, the World Bank Group and the UN, released a toolkit on OIT taxation in June 2020. The toolkit serves as a technical reference or guidance for developing countries to design their tax legislative framework on OIT taxation. China introduced OIT taxation rules back in 2009 and has accumulated substantial experience on OIT taxation.

In this seminar, the speakers will share with us:

- Why PCT issued a toolkit for OIT taxation
- Tax issues associated with OIT and sharing of examples to illustrate the tax impact on OIT
- The two models under the toolkit; pros and cons of the two models
- OIT taxing rules in China and the lessons learnt on imposing tax on OIT
- Experience sharing on handling OIT taxation cases in China

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## About the event

**Available period** 19 Oct 2020 – 18 Oct 2021

**Format** E-seminar

**Fee**

- Taxation Faculty member: HK\$120
- HKICPA member or student; and IA/ HKIAAT's member or student: HK\$150
- Non-member: HK\$330

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**Language** Cantonese

**HKICPA CPD credit** 1.5 hours (subject to actual attendance)

**Rating** Advanced level\*

**Competency** Taxation\*

**Application deadline** Online registration by 18 Oct 2021  
(offline registration by 13 Oct 2021)

### Speakers

#### Lorraine Cheung

Member, Institute's Taxation Faculty China Tax Sub-committee, and Partner, China Tax and Business Advisory Services, EY

#### Joice Wang

Senior Manager, China Tax & Business Advisory Services, EY

### Moderator

#### Eric Chiang

Deputy Director, Advocacy & Practice Development, HKICPA

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



## About the speakers

### **Lorraine Cheung**

**Member, Institute's Taxation Faculty China Tax Sub-committee, and Partner, China Tax and Business Advisory Services, EY**

Lorraine has been with EY for over 20 years. She has had extensive compliance and consulting experiences in China tax and been involved in many investment and re-structuring projects of various industries including trading, technology, imports/exports, computers manufacturing, pharmaceutical and health care, real estate development and many others. Her clients include a number of Fortune 500 companies. The spectrum of her advice spans across inbound investment by foreign companies, domestic tax affairs and controversies resolution. Her specialty also includes international tax planning and cross border structuring.

### **Joice Wang**

**Senior Manager, China Tax & Business Advisory Services, EY**

Joice has been with EY for over 10 years. She specializes in China tax and business advisory and she has been assisting her clients, both multinational corporations and domestic companies, on in-depth technical research on various tax subjects and also on the implementation side of the transactions. Joice serves a wide spectrum of clients such as private equity funds, real estates, luxury goods, hi-tech and semi-government organizations, many of which are listed in major financial markets.

In addition, Joice has undertaken diversified tax projects such as corporate restructuring, M&A, pre-IPO planning, cross-border transactions and tax disputes resolution.

Joice is a HKICPA member; she also holds a master degree in Economics from University of Hong Kong and a bachelor degree in Economics from Zhejiang University, China.