

# E-learning webinar: Event code: EWEB21120301 Practical Approaches in Handling IRD Tax Audits - From Cradle to Resolution

In the current environment, with the government running budget deficits, the Hong Kong Inland Revenue Department (IRD) is likely to be increasingly active in conducting tax audits. At the same time, the last thing businesses would like to face in the current challenging times is a tax audit by the IRD. Meanwhile, with the upcoming statutory time bar for the year of assessment 2015/16, the IRD is expected to be issuing protective assessments in the coming few months, and to be opening new tax audit cases, covering years going back to 2015/16. Therefore, business leaders and their tax advisors need to be extra vigilant in handling their tax matters to avoid becoming the next target of a tax audit.

In this interactive workshop, the speakers will use case studies to demonstrate practical approaches and different strategies to handle tax audits. They will explain common issues triggering tax audits and take the participants through the journey from cradle to final resolution of a tax audit. The speakers will also address participants' questions.

Topic and event code	Date and time	Speakers
Practical approach in handling IRD tax audit  - From cradle to resolution		Philip Hung Director, Tax Controversy Services, PwC
Event code: EWEB21120301		Felix Tsang
Part I	Friday, 3 December 2021, 6:30 p.m. to 8:30 p.m.	Senior Manager, Tax Controversy Services, PwC
Part II	Friday, 10 December 2021, 6:30 p.m. to 8:30 p.m.	Flora Chan Senior Manager, Tax Controversy Services, PwC

Format Live webinar

Language English

Fee HK\$240 (Taxation Faculty member)

HK\$300 (HKICPA member or student; and IA)

HK\$660 (Non-member)

Participants Members working in the field of taxation or with an interest in taxation

Competency\* Taxation

Rating\* Intermediate level

CPD hours 4

<sup>\*</sup> Please refer to the <u>Institute's online CPD Learning Resource Centre</u> for descriptions of competency and rating.



#### **About the webinars**

### Practical approach in handling IRD tax audit – from cradle to resolution

(Event code: EWEB21120301)

Part I on Friday, 3 December 2021 Course outline:

#### Introduction to IRD tax audit

The speakers will discuss the following topics:

- Brief background on IRD structure
- Process of the IRD tax audit review
- Who are the IRD's tax audit targets?
- The importance of the initial interview during a tax audit

## Part II on Friday, 10 December 2021 Course outline:

#### Practical approach in handling tax audit

The speakers will share practical experience on the following topics:

- What kind of information is essential for resolving tax audits?
- How to formulate a settlement proposal
- How to mitigate possible penalties
- How to prepare for possible litigation with the IRD



#### About the Speakers

#### Philip Hung

#### Director, Tax Controversy Services, PwC Hong Kong

Philip is a director in PricewaterhouseCoopers Ltd. He has over 35 years' experience in Hong Kong taxation with six years in the IRD. He is a well-known expert in the tax field and investigation specialty. After he left the IRD, Philip concentrated on 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 SMEs, listed companies and various MNCs, involving complicated cases such as worldwide onshore/offshore claim, disputes on contract 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.

#### Felix Tsang

#### Senior Manager, Tax Controversy Services, PwC Hong Kong

Felix has over 15 years of experience in resolving tax audits, tax investigation and other tax disputes for multinational corporations and local SMEs in different industries, including manufacturing, services, fund management and charitable institutions, involving a diverse range of issues such as offshore claims, cross-border transactions, contract/ import processing arrangements, anti-avoidance, transfer pricing, tax exemption claims and Board of Review proceedings.

With insights in tax dispute resolution, Felix also has comprehensive experience in providing practical tax and business advice from a dispute prevention angle, including tax health check, defence file building, post-audit restructuring, tax due diligence, fee structure for fund management, and charity set up.

#### Flora Chan

#### Senior Manager, Tax Controversy Services, PwC Hong Kong

Flora has over 10 years' experience providing Hong Kong tax controversy services to multinational corporations, local entities as well as charitable institutions, and providing Australian tax advisory and compliance services to conglomerates, listed companies and large private groups in Australia before joining the team in Hong Kong. In particular, Flora assisted clients in resolving tax disputes and tax audits conducted by the IRD and has experience in managing Board of Review proceedings for overseas clients. The controversial Hong Kong tax issues that Flora has managed include offshore claims on trading profits, commission income as well as fund management fees, royalty income on intellectual property exploited outside of Hong Kong, Macao offshore companies, deductibility of intercompany charges and stamp duty. Flora also assisted clients to prevent and manage tax controversial issues such as capital gains, and tax residency status, and has advised on group restructuring.

#### Registration

- Online enrolment <u>by 30 November</u>; offline enrolment by post or fax also by 26 November:

  Complete the enrolment form and return it to the Institute <u>by 26 November</u>, together with full payment. Cheque should be made payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA". Fax registration will be accepted for payment by any VISA/ Master card or the BOC HKICPA UnionPay card.
  - You may consider your registration to be successful unless you receive notification from us to the contrary.
- Upon successful enrolment, the meeting URL and login password will be provided nearer the event date.
- Contact Mr. Marco Yip at 2287-7009 or Mr. Bryan Kwok at 2287-7057 for enquiry.