

**Tax audit workshop 2022:
Practical Approaches in Handling IRD Tax Audits – From Cradle to Resolution
(Face-to-face rerun in Cantonese)**

Event code: SCPD23020801

About the topic

The Financial Secretary has recently predicted that the government is facing a budget deficit of over HK\$100 billion, and this announcement came just before the peak season for commencement of the Inland Revenue Department's (IRD) new tax audit cases, before the statutory time bar for the year of assessment 2016/17.

In recent years, the IRD have been deploying additional resources on tax audits. With the recent changes in the global tax environment, especially requirements from the Organisation for Economic Co-operation and Development and European Union, the IRD have also been taking a more stringent approach in tax audits involving matters such as offshore claims, interest, royalties, transfer pricing and other cross border issues. Furthermore, the IRD have also adopted new approaches towards tax audit cases because of the disruption caused by the recent IRD office relocation, which will create an additional burden on taxpayers.

Apart from the potential financial implications, taxpayers have to divert resources from normal business operations to deal with audit cases. It is essential, therefore, that taxpayers stay on top of the situation at each stage of the case, and take the necessary steps in order to bring any tax audits to an early conclusion.

In this workshop, the speakers will make use of micro-movies illustrating each step of a tax audit for common business types, and case studies to demonstrate practical approaches and various strategies to handling tax audits. They will take the participants through the journey from the start to the final resolution of a tax audit.

About the event

Date & Time 8 February 2023, Wednesday
1:00 – 5:00 pm

Venue HKICPA training centre,
27th Floor, Wu Chung House,
213 Queen's Road East, Wanchai

Fee

- Taxation Faculty member: HK\$340
- HKICPA member or student; and IA: HK\$400
- Non-member: HK\$660

Not a faculty member? [Click here](#) to join.

Language Cantonese

**HKICPA
CPD credit** 4 hours (subject to actual attendance)

Rating Intermediate level*

Competency Taxation*

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

**Application
deadline** **6 February 2023**
(offline enrolment by 2 February 2023)

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

Speakers

Philip Hung
Director,
Tax Controversy Services, PwC

Felix Tsang
Associate Director,
Tax Controversy Services, PwC

Flora Chan
Senior Manager,
Tax Controversy Services, PwC

Rundown

12:45pm	Registration (Note)
1:00pm	Introduction
1:05pm	Presentation
	Introduction to IRD tax audit
3:00pm	Break
3:10pm	Presentation
	Practical approach in handling tax audit
4:50pm	Q&A / Discussion
5:00pm	Closing

Note: No refreshment or drinks will be provided during the seminar



About the speakers

Philip Hung

Director, Tax Controversy Services, PwC Hong Kong

Philip has over 35 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 specialised 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 multinational corporations, involving complicated cases such as worldwide onshore/offshore claims, disputes on contract processing and import processing arrangements, transfer pricing adjustments, etc.

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

Felix Tsang

Associate Director, 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, and 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 checks, defence file building, post-audit restructuring, tax due diligence, fee structure for fund management, and charity set ups.

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 and 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 Hong Kong 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, Macau offshore companies, deductibility of intercompany charges and stamp duty. Flora has also assisted clients to prevent and manage tax controversy issues, such as capital gains and tax residency status, and has advised on group restructurings.



Registration

- **Online enrolment by 6 February; offline enrolment by post also by 2 February:**

Complete the enrolment form and return it to the Institute by 2 February, together with full payment. Cheques 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.

- Enrolments will be accepted on a first-come-first-served basis with priority given to the Institute's members.
- If the workshop needs to be cancelled, HKICPA will notify all applicants by email on or before **6 February 2023** and arrange full refund. Due to the constantly evolving COVID-19 pandemic situation, the Institute may reschedule or cancel the workshop at short notice.
- **Contact Mr. Marco Yip at 2287-7009 for enquiry.**

Remarks

In light of the continuing risks posed by COVID-19, the Institute is adopting the following precautionary measures at the workshop (subject to change):

- All speakers and participants will be required to:
 - submit a health declaration form upon entering the classroom
 - wear a face mask at the Institute and throughout the workshop
 - undergo compulsory temperature screening at the Institute's registration counter
 - use sanitizing gel provided for disinfection of hands before entering the workshop venue
 - sit at a distance from each other and avoid close contact
- No refreshment or drinks will be provided during the workshop.
- Participants are NOT ALLOWED to bring/eat food and drinks at the venue.
- As it takes some time for completing the registration, participants are encouraged to arrive at the Institute earlier to avoid last minute rush.

Disclaimer

- *The opinions expressed by external guest speakers are, by their nature, those of the speakers. They are not necessarily endorsed by the Institute or reflect the official policies and views of the Institute or its members.*
- *The Institute does not endorse or recommend any products or services and is not responsible to any loss or damage arising from using such products or services.*
- *Participants are reminded that there are a wide range of products or services available in the market. Participants should carry out their own research and obtain independent advice before subscribing to any products or services.*
- *The Institute takes no responsibility for any loss incurred by any person acting or refraining from acting as a result of participation in the event.*