

E-learning webinar:

Event Code: EWEB23022301

## Foreign-sourced income exemption regime webinar series An overview of the new foreign-sourced income exemption regime (Cantonese)

### About the topic

The Taxation Faculty is organizing a series of e-seminars to provide members with a better understanding of the new foreign-sourced income exemption (FSIE) regime in Hong Kong. In addition to giving an overview of the FSIE regime, specific issues under the FSIE regime (such as the treatment of intellectual property income) will also be covered in the upcoming seminars.

Further to the webinar delivered by Mr Benjamin Chan, Deputy Commissioner (Technical) of the Inland Revenue Department (IRD), on Hong Kong's new FSIE regime in mid-December, the Inland Revenue (Amendment) (Taxation on Specified Foreign-sourced Income) Ordinance 2022 was gazetted on 23 December 2022 and came into effect on 1 January 2023.

To address the European Union's concerns about the risks of double non-taxation under Hong Kong's offshore regime for passive income, the ordinance sets out a new framework for Hong Kong's FSIE regime. Under the ordinance, foreign-sourced interest, dividends, disposal gains from the sale of equity interests and intellectual property income may be deemed to be sourced from Hong Kong and chargeable to profits tax, unless certain requirements are met, such as having sufficient economic substance in, or nexus to, Hong Kong. The ordinance also provides relief against double taxation in respect of relevant income.

In this seminar, the speakers will:

- Give an overview of the new FSIE regime
- Discuss the administrative guidance and technical support provided by the IRD
- Explore how businesses will be impacted and discuss how they should handle the potential challenges

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### About the event

<b>Date &amp; time</b>	<b>Thursday, 23 February 2023 1:00 p.m. – 2:00 p.m.</b>
<b>Format</b>	<b>Live webinar</b>
<b>Fee</b>	<ul style="list-style-type: none"> <li>• Taxation Faculty member: HK\$170</li> <li>• HKICPA member or student; and IA: HK\$200</li> <li>• Non-member: HK\$330</li> </ul> <p><i>Not a faculty member? <a href="#">Click here</a> to join.</i></p>
<b>Language</b>	Cantonese with English terminology
<b>HKICPA CPD credit</b>	1 hour (subject to actual attendance)
<b>Rating</b>	Intermediate level*
<b>Competency</b>	Taxation*
<b>Application deadline</b>	<b>Online registration by 21 February 2023 (offline registration by 17 February 2023)</b>

### Speakers

#### Sharon To

Member, Taxation Faculty  
Member Services Panel, and  
Director, International Tax and  
Transaction Services, Ernst &  
Young Tax Services Limited

#### Jerry Lau

Tax Senior Manager, International  
Tax and Transaction Services,  
Ernst & Young Tax Services  
Limited

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



## About the speakers

### Sharon To

**Director, International Tax and Transaction Services, Ernst & Young Tax Services Limited**

Sharon has more than 14 years of professional experience in international tax and business advisory. She provides tax and business advice to multinational companies in different sectors, including real estate, natural resources, food & beverage, hospitality and consumer products.

Sharon advises on cross-border transactions and structuring, including inbound and outbound investments in the APAC region, tax treaty interpretations, outbound remittance and tax structuring, etc. She also provides clients with Hong Kong and China tax advisory and due diligence services.

### Jerry Lau

**Tax Senior Manager, International Tax and Transaction Services, Ernst & Young Tax Services Limited**

Jerry is a Senior Manager of EY Hong Kong office with 10 years of experience in advising on Hong Kong tax. He serves a wide range of clients including Hong Kong listed corporations, China state-owned enterprises and multinational groups.

In particular, he has assisted different clients on corporate tax issues related to restructuring as well as mergers and acquisitions. His advice also covers offshore claims reviews, intellectual property licensing and planning, legal entity rationalization and cross border transactions.

His client portfolio comprises of a wide range of industries, including telecommunication and technology, consumer products, hospitality, automotive, media and entertainment, real estate, shipping and logistics.

### 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.
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- 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.

## Registration

- **Online enrolment by 21 February; offline enrolment by post or e-mail also by 17 February:**

Complete the enrolment form and return it to the Institute by 17 February, together with full payment. Cheque should be made payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA". E-mail 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. Denise Kwok at 2287-7253 for enquiry.**