

E-learning webinar:

Event Code: EWEB23030902

Foreign-sourced income exemption regime webinar series Dividends, disposal gains and interest income

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 will also be covered.

Further to the webinar delivered by Mr Benjamin Chan, Deputy Commissioner (Technical) of the Inland Revenue Department (IRD), on Hong Kong's proposed 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 Hong Kong. The ordinance also provides relief against double taxation in respect of relevant income.

In this seminar, the speakers will:

- Discuss the FSIE regime's impact on foreign-sourced dividends, equity disposal gains and interest income
- Discuss practical issues facing businesses and the IRD's latest guidance on the FSIE regime
- Provide a comparison between the FSIE regimes of Hong Kong and Singapore

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About the event

Date & time	Thursday, 9 March 2023 6:00 p.m. – 7:00 p.m.
Format	Live webinar
Fee	<ul style="list-style-type: none"> • Taxation Faculty member: HK\$170 • HKICPA member or student; and IA: HK\$200 • Non-member: HK\$330 <p><i>Not a faculty member? Click here to join.</i></p>
Language	English
HKICPA CPD credit	1 hour (subject to actual attendance)
Rating	Intermediate level*
Competency	Taxation*
Application deadline	Online registration by 7 March 2023 (offline registration by 3 March 2023)

Speakers

Anita Tsang

Director, Tax Policy and
Knowledge Management, KPMG
China

Johnson Tee

Director, Hong Kong Corporate
Tax, KPMG China

Chair

Eugene Yeung

Convenor, TF Budget Proposals
Task Force, and member, TF
Executive Committee, and
Partner, Business Tax Advisory,
KPMG China

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



About the speakers

Anita Tsang

Director, Tax Policy and Knowledge Management, KPMG China

Anita has over 15 years of experience in Hong Kong and international taxation. Before joining KPMG as a tax technical director, Anita worked in the Tax Services Team at Arthur Andersen and the National Tax Policy Team at PricewaterhouseCoopers.

Anita has been actively engaged in studying and providing recommendations on various Hong Kong and international tax policies and issues in her capacity as a tax technical director and members of the tax committees of various professional bodies. Her other roles include providing in-house tax technical support and training at KPMG, as well as producing the firm's tax publications. Anita is a regular speaker at tax seminars.

Anita is a council member, co-chairman of the Tax Policy Committee and vice-chairman of the International Tax Committee of the Taxation Institute of Hong Kong, a member of the Tax Sub-committee of ACCA Hong Kong and a fellow member of HKICPA.

Johnson Tee

Director, Hong Kong Corporate Tax, KPMG China

Johnson Tee is a director in the Hong Kong corporate tax practice. Johnson has 20 years of Hong Kong and Malaysian corporate tax experience, performing tax advisory and compliance services for financial institutions and multinational corporations with a particular focus on asset management clients.

Johnson has a wide range of experience in the establishment and structuring of offshore funds, advising on operating protocols for funds, assistance with applying for treaty benefits and advising on the structuring of management fees and carried interest.

Johnson graduated with a bachelor's degree in business from Monash University (Australia) and is a member of CPA Australia.

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.

Registration

- **Online enrolment by 7 March; offline enrolment by post or e-mail also by 3 March:**

Complete the enrolment form and return it to the Institute by 3 March, 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.**