

Face-to-face seminar:

Event Code: SCPD23092801

## Entering the BEPS 2.0 Pillar Two Era: Overview of the new tax landscape and its impacts

### About the topic

The Organisation for Economic Co-operation and Development (OECD)'s Inclusive Framework on Base Erosion and Profit Shifting (BEPS) has adopted a two-pillar solution to address challenges arising from the digitalization of the economy and other concerns. Pillar Two introduces a global minimum effective tax rate (ETR) to be imposed on multinational groups with consolidated revenue over €750 million. Several jurisdictions, including European Union countries, the United Kingdom, Japan, and South Korea, have already announced the implementation of Global Anti-Base Erosion (GloBE) rules and a domestic top-up tax of 15% commencing from 2024, while Hong Kong and Singapore are expected to introduce the rules in 2025.

As the implementation of Pillar Two draws closer, it is crucial to understand how the Pillar Two rules work and their potential impact, as immediate actions could be required to prepare group structures, internal systems, and in-house finance and tax teams for this upcoming tax challenge.

In this seminar, the speakers will:

- Introduce the key policies and latest developments of Pillar Two
- Share potential impacts through case studies
- Discuss the latest developments of Pillar Two digital tools
- Provide guidance on how enterprises can prepare for the requirements and challenges of Pillar Two

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### About the event

<b>Date &amp; time</b>	<b>Thursday, 28 September 2023</b> <b>6:00 p.m. – 7:30 p.m.</b>
<b>Venue</b>	HKICPA training centre, 27th Floor, Wu Chung House, 213 Queen's Road East, Wanchai
<b>Fee</b>	<ul style="list-style-type: none"> <li>• Taxation Faculty member: HK\$200</li> <li>• HKICPA member or student; and IA: HK\$230</li> <li>• Non-member: HK\$360</li> </ul> <p><i>Not a faculty member? <a href="#">Click here</a> to join.</i></p>
<b>Language</b>	English
<b>HKICPA CPD credit</b>	1.5 hours (subject to actual attendance)
<b>Rating</b>	Intermediate level*
<b>Competency</b>	Taxation*
<b>Application deadline</b>	<b>Online registration by 26 September 2023</b> (offline registration by 25 September 2023)

### Speakers

#### Jesse Kavanagh

Member, Taxation Faculty  
International Tax Task Force, and  
Tax Partner and Hong Kong Tax  
Reporting & Strategy Leader,  
PwC Hong Kong

#### Flora Chan

Tax Partner, PwC Hong Kong

#### Ivan Lam

Tax Director, PwC Hong Kong

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



## About the speakers

### **Jesse Kavanagh**

**Member, Taxation Faculty International Tax Task Force, and Tax Partner and Hong Kong Tax Reporting & Strategy Leader, PwC Hong Kong**

Jesse Kavanagh has 25 years of tax experience as an advisor and in-house tax director roles, and he leads PwC Hong Kong's BEPS taskforce. He has worked with over 50 client groups across different industries, assisting with education, impact assessments, modelling, technical advice, mitigation planning and operational aspects, such as data gathering and automation. He has published articles, spoken at webinars and represented industry groups to lobby authorities on the topic.

Supplementing Jesse's BEPS work, he has led multiple projects on international tax structuring, and tax function effectiveness (e.g., leveraging tax technology and automation). Having worked in Hong Kong, Australia and the United States, Jesse brings a strong international focus to his work, and manages several clients' global and regional relationships.

### **Flora Chan**

**Tax Partner, PwC Hong Kong**

Flora Chan is a tax partner in PwC Hong Kong's BEPS taskforce. Flora has over 12 years of experience providing Hong Kong tax advisory and controversy services, and Australian tax advisory services to conglomerates, listed and large private groups, local entities, as well as charitable institutions.

Flora specializes in the global minimum tax under BEPS 2.0, she has worked with multinational groups across different industries to provide training to in-house teams, and assist with impact assessments, modelling, technical advice, mitigation planning, and operational enhancement.

In addition, Flora assisted clients in resolving tax disputes and tax audits with the Hong Kong Inland Revenue Department and has experience in managing Board of Review proceedings for overseas clients. 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.

### **Ivan Lam**

**Tax Director, PwC Hong Kong**

Ivan Lam is a tax director in PwC Hong Kong's BEPS taskforce. Ivan has over 15 years of experience in tax and regulatory consulting services. As a very experienced tax expert, Ivan is also specialized in corporate restructuring, mergers and acquisitions, tax health check and financial planning for inbound/outbound investment.

Since 2021, Ivan has assisted over 30 MNC groups (covering financial services, property development, asset management, hi-tech, listed groups and family offices) to assess the BEPS 2.0 impact to the group and provided different solutions (e.g. corporate restructuring, value chain transformation, transfer pricing arrangement, etc.) to the groups to minimize such impact. Ivan has also been providing BEPS 2.0 compliance support to these groups, such as provision of BEPS 2.0 training to the finance/ tax personnel, preparation of BEPS 2.0 data input guidance, supporting ERP system upgrade, etc.



## Registration

- **Online enrolment by 26 September; offline enrolment by post or email also by 25 September:**  
Complete the enrolment form and return it to the Institute by 25 September, 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.**
- **Contact Ms. Sophia Lai at 2287-7067 or Ms. Denise Kwok at 2287-7253 for enquiry.**

## Remarks

- *Participants shall maintain good personal hygiene and pay attention to their health condition. If you have any respiratory symptoms, please avoid attending this event and consult a doctor. To ensure the health of fellow participants, sanitizing gel is provided for disinfection of hands at the venue.*

### 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.*