

**Tax audit workshop:  
Practical Approaches in Handling IRD Tax Audits – From Cradle to Resolution**  
Event code: SCPD24111801

### About the topic

With the Inland Revenue Department's ("IRD") new management and the recent developments in local tax legislation, as well as changes in the global tax environment, the IRD's approach to tax audits will continue to evolve, and is likely to cover a broader spectrum of issues, such as foreign source income, offshore claims, interest, royalties, transfer pricing and other cross border issues. While the Hong Kong SAR Government incurs more frequent budget deficits and the financial reserves continue to decrease, one may expect the IRD's approach to tax audits will become increasingly stringent. In addition, cases are being referred to the prosecution section for further examination.

In the current economic environment, taxpayers under audit will face not only potential financial implications but need to divert resources from normal business operations to deal with the tax audit case. It is therefore essential 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 the most recent cases to demonstrate practical approaches and various strategies to handle tax audits, as well as looking at issues commonly triggering tax audits. They will take the participants through the journey from the start to the final resolution of a tax audit.

[Click here](#) for more events by Taxation Faculty

### About the event

<b>Date &amp; Time</b>	18 & 25 November 2024, Monday 1:00 – 5:00 pm
<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\$460</li><li>HKICPA member or student; and IA: HK\$540</li><li>Non-member: HK\$800</li></ul> <i>Not a faculty member? <a href="#">Click here</a> to join.</i>
<b>Language</b>	English
<b>HKICPA CPD credit</b>	8 hours (subject to actual attendance)
<b>Rating</b>	Intermediate level*
<b>Competency</b>	Taxation*
<b>Participant</b>	Members working in the field of taxation or with an interest in taxation
<b>Application deadline</b>	<b>14 November 2024</b> (offline enrolment by 13 November 2024)

### Speakers

**Philip Hung**  
Director,  
Tax Controversy Services, PwC

**Felix Tsang**  
Associate Director,  
Tax Controversy Services, PwC

**Kitty Yen**  
Manager,  
Tax Controversy Services, PwC

### Rundown

<b>12:45pm</b>	Registration (Note)
<b>1:00pm</b>	Introduction
<b>1:05pm</b>	Presentation
<b>3:00pm</b>	Break
<b>3:10pm</b>	Presentation
<b>4:50pm</b>	Q&A / Discussion
<b>5:00pm</b>	Closing

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

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



## About the seminar

### **Practical Approaches in Handling IRD Tax Audits – From Cradle to Resolution**

(Event code: SCPD24111801)

#### **Part I on Monday, 18 November 2024**

##### **Course outline:**

##### **Introduction to IRD tax audits**

The speakers will discuss the following topics:

- IRD's structure, new management and its relevance to handling tax audits.
- Tax audit process and significance of each step.
- Common trigger points of a tax audit and recent issues arising.
- The importance of the initial interview during a tax audit, and do's and don'ts during the interview for the taxpayer and tax representative.
- Common mistakes when handling a tax audit.

#### **Part II on Monday, 25 November 2024**

##### **Course outline:**

##### **Practical approach in handling tax audit**

The speakers will share their practical experience on the following topics:

- What kinds of information are essential for resolving tax audits?
- Ways and means to resolve a tax audit case and different approaches used for different scenarios.
- How to mitigate possible penalties?
- Case studies
- Q&A



## 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.

### Kitty Yen

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

Kitty has been working in Hong Kong taxation field for more than 5 years. Before joining PwC Hong Kong, Kitty had been working in the Inland Revenue Department under the Field Audit and Investigation Unit and Salaries Tax Unit for over 2 years. Kitty has assisted clients in resolving various tax dispute cases, including tax audit cases and complicated profits tax dispute cases with the IRD for listed companies, multinational enterprises and SMEs in different sectors. Kitty has also assisted in other areas including tax dispute cases for local charitable institutions and application of Hong Kong tax resident certificates for multiple companies.

## Registration

- **Online enrolment by 14 November; offline enrolment by post also by 13 November:**  
Complete the enrolment form and return it to the Institute by 13 November, together with full payment. Cheques should be made payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA". Email 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.
- **Contact Mr. Terry Lam at 2287-7386 or Ms. Minjun Wei at 2287-7067 for enquiry.**

## Remarks

### 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 for 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.