

**Tax audit workshop:
Practical Approaches in Handling IRD Tax Audits – From Cradle to Resolution
(rerun in Cantonese)** Event code: SCPD25011301

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. In addition, given the Hong Kong SAR Government's financial constraints, one may expect the IRD's approach to tax audits will become increasingly stringent. Cases are also being referred to the prosecution section for further examination.

In the current economic environment, taxpayers under audit will not only face potential financial implications but will need to divert valuable 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 steps 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

Date & Time	13 & 27 January 2025, Monday 1:00 – 5:00 pm
Venue	HKICPA training centre, 27th Floor, Wu Chung House, 213 Queen's Road East, Wanchai
Fee	<ul style="list-style-type: none">• Taxation Faculty member: HK\$460• HKICPA member or student; and IA: HK\$540• Non-member: HK\$800 <i>Not a faculty member? Click here to join.</i>
Language	Cantonese with English terminology
HKICPA CPD credit	8 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	9 January 2025 (offline enrolment by 8 January 2025)

* 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

Kitty Yen
Manager,
Tax Controversy Services, PwC

Rundown

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

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



About the seminar

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

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Part I on Monday, 13 January 2025

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 dos and don'ts during the interview for the taxpayer and tax representative.
- Common mistakes when handling a tax audit.

Part II on Monday, 27 January 2025

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 was working in the Inland Revenue Department in the Field Audit and Investigation Unit and Salaries Tax Unit for over two 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 applications for Hong Kong tax resident certificates for multiple companies.

Registration

- **Online enrolment by 9 January; offline enrolment by post also by 8 January:**

Complete the enrolment form and return it to the Institute by 8 January, 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 Ms. Minjun Wei at 2287-7067 or Mr. Terry Lam at 2287-7386 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.
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