



E-learning webinar:

Event Code: EWEB25021102

## BEPS 2.0 implementation in Hong Kong: Latest developments and their impact on Hong Kong's taxation

### About the topic

Over 130 jurisdictions in the OECD/G20 Inclusive Framework on BEPS agreed a two-pillar solution to address the tax challenges arising from the digitalisation of the economy, in October 2021. Pillar Two introduces a global minimum effective tax rate to be imposed on multinational enterprise (MNE) groups with consolidated revenue of or above €750 million. A number of jurisdictions, including European Union countries, the United Kingdom, Japan, and South Korea, have already announced the implementation of the Global Anti-Base Erosion (GloBE) rules and a domestic top-up tax (DMT) of 15%, commencing from 2024. Hong Kong also plans to implement the GloBE rules and a DMT from 2025.

Following the consultation on implementation of the GloBE rules and DMT in Hong Kong in December 2023, the Financial Services and the Treasury Bureau and the Inland Revenue Department (IRD) jointly issued a Legislative Council (LegCo) briefing paper on the outcome of the consultation in October 2024. The LegCo paper summarises the feedback received from stakeholders and sets out the government's responses to the views received. Subsequently, the Inland Revenue (Amendment) (Minimum Tax for Multinational Enterprise Groups) Bill 2024 has been gazetted in January 2025, with retrospective effect from 1 January 2025.

In this webinar, the speakers will:

- provide an overview of the GloBE rules and DMT
- highlight the main points of the legislation
- explain the Government's position and approach on certain important issues regarding the GloBE rules and DMT
- discuss the potential impact on in-scope MNE groups and refer to the technical support provided by the IRD to facilitate compliance

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### About the event

<b>Date &amp; time</b>	<b>Tuesday, 11 February 2025</b> <b>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\$230</li><li>• HKICPA member or student; and IA: HK\$270</li><li>• Non-member: HK\$400</li></ul> <i>Not a faculty member? <a href="#">Click here</a> to join.</i>
<b>Language</b>	English
<b>HKICPA CPD credit</b>	1 hour (subject to actual attendance)
<b>Rating</b>	Advance level*
<b>Competency</b>	Taxation*
<b>Application deadline</b>	<b>Online registration by 7 February 2025</b> (offline registration by 6 February 2025)

### Speakers

#### Ricky Tam

Partner, Global Compliance & Reporting, Ernst & Young Tax Services Limited

#### Winnie Kwan

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

#### Emily Maio

Manager, International Tax and Transactions Services, Ernst & Young Tax Services Limited

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



## About the speakers

### **Ricky Tam**

#### **Partner, Global Compliance & Reporting, Ernst & Young Tax Services Limited**

Ricky has extensive experience in advising major multinationals, large Hong Kong corporations and Mainland enterprises on corporate restructuring assignments, inbound and outbound holding structure planning, tax efficient financing structures, cross border transactions and tax residence planning and applications. He is also actively involved in pre-listing reorganisations as well as global tax compliance and reporting projects.

Ricky is a regular speaker in business and professional organisations, and a seasoned tax technical article contributor to newspapers.

### **Winnie Kwan**

#### **Member, Taxation Faculty Member Services Panel, and Partner, International Tax and Transaction Services, Ernst & Young Tax Services Limited**

Winnie has over 15 years of experience in providing international tax and business advisory services to a wide range of clients, including multinational corporations, listed groups and privately owned businesses. Winnie has clients from various industries, specialising in technology, media, telecommunications.

Winnie's tax experiences include tax compliance and tax advisory, such as tax due diligence, group restructuring planning, IP structuring, operation review, offshore claim exercise, advice on cross-border transactions, tax resident certificate applications, BEPS 2.0 support and permanent establishment assessment.

Winnie is a frequent speaker in tax seminars and workshops. She is also an author of various tax articles.

### **Emily Maio**

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

Emily has over 7 years of experience in providing corporate tax and business advisory services to clients from various industries. Emily's clients include multinational corporations, listed groups and privately owned businesses. She has extensive experience in tax compliance and advisory work, tax due diligence review, tax health check, IP structuring, stamp duty assistance, offshore claim analysis, BEPS 2.0 support and applications for tax resident certificates for tax treaties between Hong Kong and overseas jurisdictions.

Emily has been a speaker and assisted in Ernst & Young Tax Services Limited's tax events and trainings.

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## Registration

- **Online enrolment by 7 February; offline enrolment by post or e-mail also by 6 February:**

Complete the enrolment form and return it to the Institute by 6 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 for enquiry.**