



New transfer pricing rules under the Hong Kong Inland Revenue Ordinance

Programme Code: SCPD18091301

About the topic

New transfer pricing rules together with other BEPS measures have been incorporated into the domestic tax laws of Hong Kong. Hong Kong taxpayers have to prepare for this by ensuring that their related party transactions are at arm's length.

In this seminar, our speakers will cover:

- Transfer Pricing Regime including the arm's length principle which is codified into domestic tax law, and the corresponding penalty if failing to comply with the transfer pricing rules.
- Strategic approaches to compliance: Country by Country ("CbC") reporting, Master File and Local File. What about day-to-day implementation and restructuring of pre-new regime transaction flows?
- Experience sharing and case studies

About the event

Date & Time	13 September 2018, Thursday 7:00 – 8:30 pm
Venue	HKICPA training centre 27 th Floor, Wu Chung House 213 Queen's Road East, Wanchai
Fee	<ul style="list-style-type: none">• Taxation Faculty member: HK\$120• HKICPA member or student; and IA/ HKIAAT's member or student: HK\$150• Non-member: HK\$330 <i>Not a faculty member? Click here to join.</i>
Language	English
HKICPA CPD credit	1.5 hour (subject to actual attendance)
Rating	Advanced level*
Competency	Taxation*
Participant	Tax practitioners and those who wish to know transfer pricing in Hong Kong
Objective	To provide update on transfer pricing in Hong Kong
Application deadline	10 September 2018

Speaker

Patrick Cheung

Partner, Global Transfer Pricing Services, KPMG Hong Kong

Jacky Chan

Senior Manager, Global Transfer Pricing Services, China Tax Services, KPMG Hong Kong

Chair

Percy Wong

Member of HKICPA Taxation Faculty Executive Committee, and Teaching Fellow and Work-Integrated Education Coordinator, School of Accounting and Finance, The Hong Kong Polytechnic University

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

About the speaker

Patrick Cheung

Partner, Global Transfer Pricing Services, KPMG Hong Kong

Patrick is a Partner in our Hong Kong transfer pricing team and has more than 25 years of international tax experience of which over 20 of those working as a full time transfer pricing specialist.

Patrick has extensive experience in transfer pricing planning, compliance and controversy management for products, intangibles, services, financial transactions and regulatory issues. In addition to Hong Kong, he had also practiced transfer pricing in the United States, Canada and China.

Amongst Patrick's key clients are some of the world's biggest brand names in fashion, consumer and retail brands, industrial and automotive groups, high technology and pharmaceutical and science companies in the world. For these clients, he has helped designed, implemented and defended many transfer pricing models involving intangibles, principal structures, sourcing and purchasing structures involving multiple entities in the Americas, Europe and Asia. As such, Patrick is well versed in managing the needs of multiple stakeholders in these types of projects. His financial institution clients include major international commercial and investment banks, insurance and reinsurance companies as well as asset management firms.

Jacky Chan

Senior Manager, Global Transfer Pricing Services, China Tax Services, KPMG Hong Kong

Jacky is a senior manager in China Tax and Global Transfer Pricing Service team, specialized in both international tax and transfer pricing advisory for Hong Kong and China businesses. Prior to joining KPMG, Jacky started his career working as a full-time transfer pricing advisor. He also had working experience in Shenzhen, China.

Jacky has more than nine years of experience in China tax and transfer pricing advisory. He mainly advises multinational corporation clients on cross border tax and transfer pricing matters for their China businesses. His work experiences include transfer pricing risk assessment, advice on group restructuring, supply chain optimisation, due diligence exercise, IP planning, and intra-group financing and cash pooling analysis. He also represents his client in negotiating with tax authority on transfer pricing issue and he has handled a number of APA and TP audit cases in Hong Kong and China.

Jacky is actively involved in assisting clients to comply with the regulatory changes in transfer pricing documentation, country by country reporting, as well as other disclosure and information exchange requirement, as a result of the OECD BEPS Action plans. Jacky also spoke in public seminars in the area of transfer pricing. Jacky is a member of HKICPA.

Registration

- Complete online registration [by 10 September 2018](#).

Contact Natalie Cheung at 2287 7386 for enquiry.



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Programme Code: SCPD18091301

Finance & Operations Department,
Hong Kong Institute of CPAs,
37/F, Wu Chung House, 213 Queen's Road East, Hong Kong

Please click here for online enrolment
(for HKICPA members only)

Payment & Enrolment Status Enquiry: 2287 7381
e-mail: finance@hkicpa.org.hk
Fax: 2893 9853

Event Information Enquiry:
2287 7386 / 2287 7089
e-mail: nataliecheung@hkicpa.org.hk

FOR OFFICE USE

Seq. no.: _____

Deadline: 10 September 2018

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- Notes:**
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 - Successful applicants will receive confirmation of registration by email. Unsuccessful applicants will also be notified. If you have not heard from the Institute regarding your registration by **10 September 2018** and if you have other enquiries related to the programme, please make enquiry at 2287 7386.
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 - The Institute reserves the right to change the venue, date, speaker or to cancel the event due to unforeseen circumstances.
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