# **Taxation Faculty (TF)**

#### Seminar

# Transfer Pricing Series - Part 2: Separate Enterprise Principle, Intangibles and Financial Transactions Programme Code: SCPD18120402

# **About the topic**

This is the second seminar in the transfer pricing series. In this seminar, our speakers will continue to discuss the transfer pricing provisions under the Inland Revenue (Amendment) (No. 6) Ordinance 2018 and their application. The discussion will focus on:

- 1. Separate enterprise principle for attributing income or loss to permanent establishments of non-resident persons in Hong Kong (Rule 2);
- 2. Determination of arm's length price for transactions involving the use or transfer of intangibles; and
- 3. Transfer pricing issues relating to financial transactions.

#### **About the event**

Date & Time 4 December 2018, Tuesday

7:00 - 8:30 pm

**Venue** The Hong Kong General Chamber of Commerce,

22/F United Centre, 95 Queensway, Hong Kong

Fee • Taxation Faculty member: HK\$120

HKICPA member or student; and IA/ HKIAAT's

member or student: HK\$150

• Non-member: HK\$330

Not a faculty member? Click here to join.

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

**Application** 29 November 2018 deadline

\* Please refer here for descriptions of the various ratings.

#### **Speakers**

#### **Brian CHIU Kwok-kit, JP**

Deputy Commissioner (Technical)
Inland Revenue Department

## Benjamin CHAN Sze-wai

Acting Chief Assessor (Tax Treaty)
Inland Revenue Department

#### Chair

## **Martin Richter**

Partner, International Tax, EY



# **About the speakers**

# Brian CHIU Kwok-kit, JP Deputy Commissioner (Technical), Inland Revenue Department

Mr. Chiu is now the Deputy Commissioner (Technical) of the Hong Kong Inland Revenue Department. His present portfolio includes tax treaties, transfer pricing, tax appeals, technical research and advance ruling. He is the head of the Hong Kong delegation in a number of tax treaty negotiations, having overall responsibility of the work of the Tax Treaty Section.

He is currently engaged in the work relating to AEOI, BEPS and other technical legislative amendments (including the framework of enhanced tax deduction for qualifying R&D activities). He is a member of ACCA, HKICPA, ICAEW, CPA(Aust) and TIHK.

# Benjamin CHAN Sze-wai Acting Chief Assessor (Tax Treaty), Inland Revenue Department

Mr. Chan is the Acting Chief Assessor (Tax Treaty) of the Hong Kong Inland Revenue Department. His present portfolio covers various matters concerning international taxation, including AEOI, BEPS, mutual agreement procedure and advance pricing arrangement. He has been engaged in formulating the implementation strategies for BEPS in Hong Kong, and taking forward the enactment of the Inland Revenue (Amendment) (No. 6) Ordinance 2018. He is a member of HKICPA.

# Registration

• Complete online registration by 29 November 2018.

Contact Ms. Canace Leung at 2287 7089 for enquiry.



#### TAXATION FACULTY EVENT ENROLMENT FORM

Programme Code: SCPD18120402
Finance & Operations Department,
Hong Kong Institute of CPAs,
37/F, Wu Chung House, 213 Queen's Road East, Hong Kong

To confirm your CPD booking, just log on to "My CPA" at <a href="http://www.hkicpa.org.hk">http://www.hkicpa.org.hk</a>

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

**FOR OFFICE USE** Payment & Enrolment Status Enquiry: 2287 7381 Event Information Enquiry: e-mail: finance@hkicpa.org.hk 2287 7089 Fax: 2893 9853 e-mail: canace@hkicpa.org.hk Seq. no.:\_ Deadline: 29 November 2018 Membership Fee Email address \*(2) HKICPA member. Full Name of Participant(s) Taxation Non-No. Company Status student /IA/HKIAAT (Block Letters) (Block Letters) No. Member HK\$120 member, student HK\$150 HK\$330 1 2 3 4 5 Total HK\$ \* Email address is for enrolment confirmation purpose. Please refer to note (2) for details. Payment Method (Please tick the appropriate box) \_) payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA" Cheque (no. VISA / MasterCard ■ BOC HKICPA UnionPay card Card Number: Card Expiry Date (MM/YY): Cardholder's Name (block letters): Cardholder's Signature: Date: I would like to have an official receipt. (Remarks: Official receipt will be sent to your email address provided above.) Membership Status: TF = Taxation Faculty member, NP = Non-Practising, P = Practising, IA = International Affiliate, S = Student, HKIAAT = HKIAAT Student or Notes: 1. Member, GAA = GAA Passport holder, NM = Non-Member. 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 29 November 2018 and if you have other enquiries related to the programme, please make enquiry at 2287 7089. NO ADMISSION TICKET will be issued. Please bring your HKICPA membership card or confirmation email for admission purpose. All applications are on a first-come-first-served basis. Application by fax will ONLY be accepted when payment is made by credit card. Cash is strictly not accepted. Please ensure all the particulars relating to payment are completed, otherwise the application cannot be processed. There is NO need to send in the enrolment form again if it has already been faxed to the Institute. Cheque(s) should be made payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA". Please issue SEPARATE CHEQUE for each event. NO REFUND/CANCELLATION will be entertained after the application is processed. If you are unable to attend the enrolled programme, you may nominate a substitute to take your place, provided that the Institute is notified in writing at least two working days prior to the event date. All scheduled events will be cancelled in the event of typhoon signal no. 8 or above or if a Black Rainstorm warning is hoisted. For details of bad weather arrangement for CPD programmes, please refer to the Institute's homepage. The Institute reserves the right to change the venue, date, speaker or to cancel the event due to unforeseen circumstances.
 Personal Data: Your personal data collected from the enrolment process and administration of courses will be used for the purpose of the administration of the course on which you are enrolled. Such data collected may be accessible by the Institute's officers, persons or committees processing the application and related matters. In addition, the Institute may use the collected data for statistical research and analysis and, if applicable, for validation of CPD hours. The Institute intends to use the personal data of your name, email address and correspondence address to inform you, where relevant, of CPD activities, members' benefits, goods, services, facilities and events organized or provided by the Institute or other organizations. Members and registered students may opt out of receiving such materials at any time by logging in via the following link <a href="https://www.hkicpa.org.hk/en/members-area/comm-preference/">https://www.hkicpa.org.hk/en/members-area/comm-preference/</a>. Non-members may opt out of receiving such materials at any time by sending an email to the Institute at <a href="privacyofficer@hkicpa.org.hk">privacyofficer@hkicpa.org.hk</a> or a letter to the Institute's privacy officer. For more information about the privacy policy of the Institute, please go to <a href="http://www.hkicpa.org.hk/en/service-tools/privacy-policy/">http://www.hkicpa.org.hk/en/service-tools/privacy-policy/</a>. For payment by cheque, please fill-in your postal address for refund in case the event is full or cancelled. Name: Name: Address: Address: