

BEPS 2.0

Programme Code: SCPD20011501

About the topic

The Organisation for Economic Co-operation and Development (OECD) recently published its draft base erosion and profit shifting 2.0 (BEPS 2.0) proposals measures for public consultation. These measures are designed to ensure cross-border businesses pay their fair share of tax across all the jurisdictions they operate in. The proposal involves two pillars. Pillar one allocates taxing rights for cross-border activities based on revised nexus and profit allocation rules. Pillar two gives the parent and source jurisdictions a right to tax untaxed/undertaxed income where the income is taxed at an effective rate below a certain minimum rate.

In this seminar, the speakers will walk you through:

- brief historical background of the BEPS 2.0 proposals
- various digital economy business models mentioned in the OECD BEPS 2.0 proposal papers
- ideas put forward by various camps earlier on the revised nexus and profit allocation rules and what is proposed in the OECD consultation paper issued in Oct 2019
- minimum tax proposals in the OECD consultation paper issued in Nov 2019
- impacts that the BEPS 2.0 proposals may bring to the Hong Kong offshore regime, various concessionary tax regimes and the capital gains exemption

About the event

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| Date & Time | 15 January 2020, Wednesday 7:00 – 8:30 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\$120 • HKICPA member or student; and IA/ HKIAAT's member or student: HK\$150 • Non-member: HK\$330 <p><i>Not a faculty member? Click here to join.</i></p> |
| Language | English |
| HKICPA CPD credit | 1.5 hour (subject to actual attendance) |
| Rating | Advanced level* |
| Competency | Taxation* |
| Application deadline | 12 January 2020 |

Speaker

Patrick Cheung

Partner, Global Transfer Pricing Services, KPMG

Irene Lee

Partner, Global Transfer Pricing Services, KPMG

Chair

Alice Leung

Partner, Research and Development Tax, KPMG

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



About the speakers

Patrick Cheung

Partner, Global Transfer Pricing Services, KPMG

Patrick is a Partner in the firm's 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.

Irene Lee

Partner, Global Transfer Pricing Services, KPMG

Irene is a Partner of KPMG's Global Transfer Pricing Services group for Hong Kong and has more than 13 years' experience working as a full time transfer pricing specialist.

Irene has worked on a variety of TP clients and dealt with their TP issues in the past years. She has assisted various major international clients in managing, planning and documenting their TP policies in China, Hong Kong and across Asia-Pacific.

Irene also spends much time in providing regional TP consulting and planning advices to a wide range of business activities in the areas of investment banking, insurance and securities trading, sales and distribution of goods and advising clients on potential TP risks and opportunities. She has also conducted TP planning / review in relation to royalties for intellectual properties and similar related projects.

Registration

- Complete online registration by 12 January 2020. **Contact Sharon Ngai at 2287 7067 for enquiry.**



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Deadline: 12 January 2020

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