

# How to account for transfer pricing uncertainties following the introduction of HK(IFRIC)-Int 23

Programme Code: SCPD20022001

## About the topic

Effective from 1 January 2019, HK(IFRIC) Interpretation 23 Uncertainty over Income Tax Treatments (HK(IFRIC)-Int 23) brings a new approach to accounting for tax uncertainties in financial statements. Under the new approach, probability and effect of uncertainty of each tax position will have to be evaluated. As a result, companies, their auditors and their tax advisors are required to determine whether a tax position adopted would ultimately be sustained.

Transfer pricing has been a key area of focus for multinational reporting entities, particularly in light of the inherent uncertainty triggered by recent BEPS changes. By its very nature, transfer pricing is subject to a range of interpretations. HK(IFRIC)-Int 23 reinforces the need for companies to prepare sufficient documentation to identify and support their transfer pricing positions. Without such documentation, it will be very difficult for companies to determine whether it is probable for the transfer pricing treatment of their related party dealings will be accepted by tax authorities.

To help preparers and professionals to better manage the new changes, the seminar will highlight the key elements of HK(IFRIC)-Int 23 and how to establish a practical and robust framework to estimate the probable outcomes of uncertain transfer pricing positions.

## About the event

<b>Date &amp; Time</b>	20 February 2020, Thursday 7:00 – 8:30 pm
<b>Venue</b>	HKICPA training centre, 27th Floor, Wu Chung House, 213 Queen's Road East, Wanchai
<b>Fee</b>	<ul style="list-style-type: none"> <li>Taxation Faculty member: HK\$120</li> <li>HKICPA member or student; and IA/ HKIAAT's member or student: HK\$150</li> <li>Non-member: HK\$330</li> </ul> <p><i>Not a faculty member? Click <a href="#">here</a> to join.</i></p>
<b>Language</b>	Cantonese
<b>HKICPA CPD credit</b>	1.5 hour (subject to actual attendance)
<b>Rating</b>	Advanced level*
<b>Competency</b>	Taxation*
<b>Application deadline</b>	<p><b>17 February 2020</b></p> <ul style="list-style-type: none"> <li>Complete online registration by deadline. Contact Karina Yeung at 2287 7386 for enquiry.</li> </ul>

### Speaker

**Enoch Hsu**  
Director, Transfer Pricing, BDO

**Winnie SM Chan**  
Principal, Financial Reporting  
Advisory, BDO

**Michelle Cheung**  
Senior Manager, Transfer Pricing,  
BDO

### Chair

**Agnes Cheung**  
Director, Head of Tax, BDO

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



## About the speakers

### **Enoch Hsu**

#### **Director, Transfer Pricing, BDO**

Enoch has extensive global transfer pricing experience as he had been a transfer pricing economist at big four accounting firms in China, Hong Kong, and US offices since 1999. The clients Enoch served are in various industries, such as consumer products technology and telecommunication, financial services, and software. He is highly proficient in conducting global transfer pricing exercises for both compliance and advisory purposes.

Enoch has assisted multinational corporations in restructuring their business organisations by performing robust financial and economic analyses. He has also conducted wide range of intangible valuation projects to assist companies in designing and constructing their effective value chain models to achieve operational efficiency. Through negotiating with tax authorities, he has aided clients to obtain advantageous outcomes in cost sharing arrangements and advance pricing agreements. Moreover, Enoch has built his rapport with the Chinese tax authorities to resolve tax controversies and disputes.

Prior to his transfer pricing profession, Enoch was a professor of Economics at Santa Clara University, where he taught economics and finance courses. He also taught international economics at the MBA level of Leavey School of Business. Enoch obtained his doctoral degrees in Economics from Claremont Graduate University in 1998.

### **Winnie SM Chan**

#### **Principal, Financial Reporting Advisory, BDO**

Winnie is a Principal of Financial Reporting Advisory Services of BDO. In her role, Winnie focusses on advising clients on the interpretation and practical application of HKFRS/IFRS.

Winnie has over 16 years of experience across audit, technical advisory and consulting. Before joining BDO, she was with the HKICPA as Associate Director of Standard Setting. Her key responsibilities at HKICPA involved taking the lead in standard setting initiatives in HKFRS projects, handling HKFRS interpretation issues, liaising with regulatory bodies on HKFRS related matters, and providing training on the latest developments in accounting standards.

Winnie has extensive experience in providing assurance services. During her time with international accounting firms, she worked with a wide range of clients including listed, privately owned groups as well as public sector clients.

Winnie is a member of HKICPA and ICAEW.

### **Michelle Cheng**

#### **Senior Manager, Transfer Pricing, BDO**

Michelle is a Senior Manager of Transfer Pricing of BDO. She began her career in PRC tax and business tax advisory including transfer pricing services over 10 years ago. For the past 3 years she has dedicated her specialty in transfer pricing services. Being familiar with Hong Kong and PRC transfer pricing practices, Michelle is experienced in conducting transfer pricing risk assessment, advising clients on business restructuring and tax planning, pre-IPO review, and the preparation of global transfer pricing documentation for multinational enterprises.

Michelle's client portfolio in transfer pricing includes private companies, multinational groups and listed groups engage in trading, manufacturing, logistics, business services, etc.

Michelle is a member of HKICPA.



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**Deadline: 17 February 2020**

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