



E-learning webinar:

Event Code: EWEB22112101

Development of the “permanent establishment” concept in Hong Kong

About the topic

The concept of permanent establishment (PE) was first introduced in 1940s. Historically, it has not been mentioned frequently in Hong Kong because the taxability of profits has, to a great extent, depended on the question of source of profits. Since the implementation of the Base Erosion and Profit Shifting (BEPS) project by the Organisation for Economic Co-operation and Development, the definition of PE has been given a new impetus internationally. Following on from this, the enactment of Inland Revenue (Amendment) (No.6) Ordinance 2018 introduced the international standard into Hong Kong. Since then, as a result of this development, taxpayers in Hong Kong have also been focusing increasingly on transfer pricing issues related to PEs.

In this live webinar, the speakers will:

- Provide an overview of the development of the definition of “permanent establishment”
- Explore the PE concept in Hong Kong and the Mainland, and the relevant implications
- Discuss the attribution of profits to PEs under transfer pricing rules
- Share some practical cases

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About the event

Date & time	Monday, 21 November 2022 1:00 p.m. – 2:00 p.m.
Format	Live webinar
Fee	<ul style="list-style-type: none">• Taxation Faculty member: HK\$100• HKICPA member or student; and IA: HK\$120• Non-member: HK\$220 <i>Not a faculty member? Click here to join.</i>
Language	English
HKICPA CPD credit	1 hour (subject to actual attendance)
Rating	Advanced level*
Competency	Taxation*
Application deadline	Online registration by 16 November 2022 (offline registration by 14 November 2022)

Speakers

Sharon To

Member, Taxation Faculty
Member Services Sub-committee,
and Director, International Tax
and Transaction Services, Ernst &
Young Tax Services Limited

Windsor Li

Director, International Tax and
Transaction Services – Transfer
Pricing, Ernst & Young Tax
Services Limited

Winnie Kwan

Senior Manager, International Tax
and Transaction Services, Ernst &
Young Tax Services Limited

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



About the speakers

Sharon To

Director, International Tax and Transaction Services, Ernst & Young Tax Services Limited

Sharon has more than 14 years of professional experience in international tax and business advisory. She provides tax and business advice to multinational companies in different sectors, including real estate, natural resources, food & beverage, hospitality and consumer products.

Sharon advises on cross-border transactions and structuring, including inbound and outbound investments in the APAC region, tax treaty interpretations, outbound remittance and tax structuring, etc. She also provides clients with Hong Kong and China tax advisory and due diligence services.

Windsor Li

Director, International Tax and Transaction Services – Transfer Pricing, Ernst & Young Tax Services Limited

Windsor has more than 13 years of professional experience in global and regional transfer pricing analysis, international tax consulting and project management, gained from Big 4 practices in Toronto, Canada, Hong Kong and China. She has been involved in a wide range of transfer pricing projects including preparing global documentation, conducting business/tax aligned restructuring feasibility analysis, performing pre-IPO analysis and planning, and providing advice on responding to the global and local tax and transfer pricing updates.

Windsor has previously assisted in various effective tax planning projects such as establishing transfer pricing policies for large multinational companies in the luxury goods, consumer products, pharmaceutical, technology, food and beverage, natural resources, transportation and consumer electronics industries.

Winnie Kwan

Senior Manager, International Tax and Transaction Services, Ernst & Young Tax Services Limited

Winnie has over 10 years of experience in providing corporate 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, telecommunication.

Winnie's tax experience includes tax compliance and tax advisory, such as tax due diligence, group restructuring planning, IP structuring, operation review, offshore claims, advice on cross-border transactions, tax resident certificate applications and permanent establishment assessments.

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Registration

- **Online enrolment by 16 November; offline enrolment by post or e-mail also by 14 November:**
Complete the enrolment form and return it to the Institute by 14 November, 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. Anthony Lee at 2287-7386 or Ms. Denise Kwok at 2287-7253 for enquiry.**