

E-learning webinar:

Event Code: EWEB22121501

IRD update on Hong Kong's proposed new foreign-sourced income exemption regime

About the topic

The European Union (EU) announced in October 2021 the inclusion of Hong Kong in Annex II of the EU list of non-cooperative jurisdictions for tax purposes (commonly known as the "Watch List"), as it considered that the non-taxation of offshore passive income, and the absence of any requirement for recipient companies to have substantial economic activities in Hong Kong, could lead to situations of double non-taxation and exploitation of tax advantages by shell companies.

To address the EU's concerns, the Inland Revenue (Amendment) (Taxation on Specified Foreign-sourced Income) Bill 2022 has been introduced into the legislature to set out a new framework for Hong Kong's foreign-sourced income exemption (FSIE) regime. The aim is to bring the new regime into force starting 1 January 2023. Under the bill, foreign-sourced interest, dividends, disposal gains from the sale of equity interests and intellectual property income may be deemed to be sourced from Hong Kong and chargeable to profits tax, unless certain requirements are met, such as having sufficient economic substance in Hong Kong. The bill also provides relief against double taxation in respect of relevant income.

We are pleased to welcome Mr Benjamin Chan, Deputy Commissioner (Technical) of the Inland Revenue Department (IRD), to speak at this live webinar. He will:

- Outline the background to Hong Kong's inclusion on the Watch List and the EU's concerns
- Explain the proposed new FSIE regime and the IRD's administrative guidance
- Discuss the potential impact on taxpayers, and the technical support provided by the IRD to facilitate compliance by affected taxpayers

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About the event

Date & time	Thursday, 15 December 2022 3:30 p.m. – 5:00 p.m.
Format	Live webinar
Fee	<ul style="list-style-type: none">• Taxation Faculty member: HK\$170• HKICPA member or student; and IA: HK\$200• Non-member: HK\$330 <i>Not a faculty member? Click here to join.</i>
Language	English
HKICPA CPD credit	1.5 hours (subject to actual attendance)
Rating	Intermediate level*
Competency	Taxation*
Application deadline	Online registration by 12 December 2022 (offline registration by 8 December 2022)

Speaker

Benjamin Chan, JP
Deputy Commissioner
(Technical), Inland Revenue
Department

Chair

Sarah Chan
Chair, TF Executive Committee,
and Convenor, TF China Tax
Subcommittee, and Partner, Tax
and Business Advisory Services,
Deloitte China

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



About the speaker

Benjamin CHAN, JP

Deputy Commissioner (Technical), Hong Kong Inland Revenue Department (IRD)

Mr. Chan is the Deputy Commissioner (Technical) of the IRD. His present portfolio includes tax treaties, transfer pricing, tax appeals, technical research and advance rulings. He is the head of the Hong Kong delegation in treaty negotiations and is currently engaged in the work relating to BEPS 2.0, foreign-sourced income exemption for passive income and other technical legislative amendments. He is a member of HKICPA.

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Registration

- **Online enrolment by 12 December; offline enrolment by post or e-mail also by 8 December:**
Complete the enrolment form and return it to the Institute by 8 December, 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. Marco Yip at 2287-7009 or Mr. Denise Kwok at 2287-7253 for enquiry.**