



E-learning webinar:

Event Code: EWEB24062003

Mutual agreement procedure and advance pricing arrangements in Hong Kong – recent developments & cases

About the topic

In the current challenging economic and tax environment, tax disputes between multinational enterprises (MNEs) and tax authorities globally have been growing in number and size. As a dispute resolution mechanism, mutual agreement procedure (MAP) has been proven to be an effective means in resolving cross-border double taxation issues. In early 2024, the speakers at this event assisted an MNE client in concluding the first Hong Kong-Mainland MAP case in Hong Kong relating to a transfer pricing (TP) dispute, since the release of MAP guidance by the Inland Revenue Department (IRD), with a very encouraging outcome.

Meanwhile, Advance Pricing Arrangements (APA) provide a mechanism for taxpayers to obtain tax certainty for future (and past) years, which could also help reduce the incidence of double taxation and the costs associated with mitigating audits in tax controversies.

In this webinar, the speakers will:

- Share their insights and experience in dealing with MAP and APA cases in Hong Kong and the Mainland and, in particular, they will share the recent success story of the first Hong Kong-Mainland MAP case in Hong Kong
- Explore the benefits of engaging in MAPs and discuss the key considerations in the MAP application process
- Provide insights on how APAs can help manage TP risk and obtain tax certainty

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About the event

Date & time	Thursday, 20 June 2024 6:00 p.m. – 7:00 p.m.
Format	Live webinar
Fee	<ul style="list-style-type: none">• Taxation Faculty member: HK\$200• HKICPA member or student; and IA: HK\$230• Non-member: HK\$360 <i>Not a faculty member? Click here to join.</i>
Language	Cantonese with English terminology
HKICPA CPD credit	1 hour (subject to actual attendance)
Rating	Intermediate level*
Competency	Taxation*
Application deadline	Online registration by 18 June 2024 (offline registration by 17 June 2024)

Speakers

Cecilia Lee

Member, Taxation Faculty China Tax Support Group, and Hong Kong Transfer Pricing Leader, PwC Hong Kong

Tiffany Wu

Partner, Transfer Pricing Services, PwC Hong Kong

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



About the speakers

Cecilia Lee

Member, Taxation Faculty China Tax Support Group, and Hong Kong Transfer Pricing Leader, PwC Hong Kong

Cecilia has 25 years of TP experience starting with PwC's US Transfer Pricing Practice and is US CPA. She currently leads PwC's Hong Kong TP practice and advises clients on TP value chain restructuring and intangible property valuation matters from the Mainland, Hong Kong and Asia Pacific perspectives. She was also closely involved in advising the IRD during the recent codification of the Hong Kong TP legislation. Cecilia is the Asia Pacific champion partner for the BEPS Global Coordinated Documentation Committee within PwC.

She assisted in successfully concluding China's first APA on a cost sharing arrangement for a multinational company. She has helped clients on projects such as royalty structure planning and implementation, as well as in dispute resolution matters with the Mainland tax authorities, particularly in the area of intangible property transfer and intercompany services. She also advises clients with ongoing TP disputes with the IRD.

Tiffany Wu

Partner, Transfer Pricing Services, PwC Hong Kong

Tiffany is a partner at PwC Hong Kong, specialising in providing TP services for multinational clients for over 15 years. She has been actively assisting clients in value chain transformation, regional TP model set up, global and regional TP documentation, TP audit defence support, APAs and MAPs, etc. Tiffany has served a broad spectrum of multinational corporations in various industries including chemicals, technology, media and telecommunications, electronics, new energy, consumer goods, logistics and transportation, etc.

Tiffany has extensive experience in handling TP dispute resolution, APA and MAP in Hong Kong and the Mainland. She has assisted in concluding the first cost sharing arrangement (CSA) APA in the Mainland for a Fortune 500 company and assisted in concluding the first TP MAP between Hong Kong and the Mainland.

Tiffany is a frequent speaker at tax seminars with clients, professional organizations and chambers, and has contributed to professional publications. She is an HKICPA member and she holds a master degree in economics and a bachelor degree in finance.



Registration

- **Online enrolment by 18 June; offline enrolment by post or email also by 17 June:**

Complete the enrolment form and return it to the Institute by 17 June, 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 for enquiry.**

Remarks

Disclaimer

- The opinions expressed by external guest speakers are, by their nature, those of the speakers. They are not necessarily endorsed by the Institute or reflect the official policies and views of the Institute or its members.
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- The Institute takes no responsibility for any loss incurred by any person acting or refraining from acting as a result of participation in the event.