



# Asia Pacific Tax

## Transfer Pricing

### Transfer pricing dispute resolution: A focus on China, Japan, and Australia

> 18 April, 2:00 – 3:00 PM HKT (GMT +8)

Host: Fiona Craig

Presenters: Tim O'Brien, Chris Thomas, and Aaron Wang

An increase in transfer pricing controversy was always anticipated to result from the OECD BEPS program of work. Which Revenue Administrations in Asia Pacific have got on the front foot with new compliance activities? Which continue with previous areas of focus? We'll discuss:

- New audit procedural approaches introduced by Revenue Administrations.
- Practical options and guidance on best practices for resolving disputes.
- Mutual Agreement Procedure.
- The way forward.

Gain insights from Deloitte experts on the best practices for transfer pricing disputes.

### Transfer pricing documentation: Addressing the practical challenges

> 16 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Fiona Craig

Presenters: David Letos and Rahul Tomar

Transfer pricing documentation sits high on the "to do list" of multinationals around the world. But, where to start, what to prioritize and how to manage the local complexities and nuances of the new reporting regime is not always clear. In this session, we will share ideas and tips on how to manage the process of developing strategic and compliant Master Files and Local Files. We'll discuss:

- Bringing a risk management lens to the process.
  - Setting up for efficient future compliance.
  - Addressing the heightened transparency of documentation.
- Deloitte experts will share their practical experience and insights from having worked with a wide range of multinationals and developed tools and solutions to meet a variety of global documentation needs.

## Stay informed

The graphic is a promotional flyer for the Deloitte GST eLearning Programme. It features the Deloitte logo at the top left. The main heading is 'GST eLearning Programme Enabling your People'. Below this, there are several sections: 'Are you ready for change?' which discusses the impact of GST and the need for organizations to adapt; 'eLearning Modules' which lists four modules: 'Introduction to GST', 'GST for Business Owners', 'GST for Professionals', and 'GST for Customers'; 'Helping you prepare for GST' which lists various services like workshops and webinars; 'Technology enabled learning experience' which highlights features like on-demand content and mobile access; and 'Request a demo' with contact information. The graphic uses a green and blue color scheme with icons representing people, documents, and technology.

The introduction of GST signifies material change and in order to be ready, organizations will need to adapt and prepare effectively. To assist in helping individuals understand what GST means for them, four specific e-learning modules have been developed. Visit [www.deloitte.com/in](http://www.deloitte.com/in) or contact your Deloitte contact to help you stay relevant and become GST ready.

## India Spotlight

### Tax impact of Indian Accounting Standards (IndAS)

> 20 April, 2:00 – 3:00 PM HKT (GMT +8)

Host: Sunil Shah

Presenters: Anand Subramanian, Promod Batra, and Jatin Kanabar

Many Indian companies are required to adopt the new Indian Accounting Standards (IndAS) in a phased manner starting from Financial Year 2016-17. IndAS brings in the concept of time, value of money, fair valuation, and substance of a transaction in accounting rather than form. IndAS will have a significant impact in computing the income of the company both under the Minimum Alternate Tax (MAT) provisions and under the normal provisions of Income Tax Act, 1961 (the Act). In Budget 2017 presented on 1 February 2017, though the government has announced certain changes in MAT provisions for IndAS compliant companies, a number of questions remain unanswered and the challenges in computing the normal income continues. We'll discuss:

- IndAS – applicability and key accounting principles.
- Amendments in MAT provisions for IndAS Compliant companies, along with illustrations.
- Interplay of IndAS vis a vis Income Tax Computation and Accounting standards in computing the income under the normal provisions of the Act.
- Transition issues.

Gain a better understanding of the new Indian Accounting Standards and how they would impact your Indian tax position.

### Insolvency and Bankruptcy Code 2016: Step towards speedy resolution process

> 27 April, 2:00 – 3:00 PM HKT (GMT +8)

Host: Mehul Modi

Presenters: Anjali Malhotra and Sameer Maniar

In India, multiple laws and adjudication authorities make the procedure for corporate and individual insolvency and bankruptcy cumbersome as well as time consuming. For speedy resolution of insolvency proceedings, a consolidated legislation, i.e., The Insolvency and Bankruptcy Code 2016 (Code) was enacted effective from May 2016. The Code designates the National Company Law Tribunal (NCLT) and Debt Recovery Tribunal (DRT) as adjudicating authority in this regard for Companies / LLPs and Individuals / Partnership Firms, respectively. For corporates, what does this mean in terms of impact on their business continuity where a company is unable to pay its debts? We'll discuss:

- Highlights of the Code – a step for speedy insolvency resolution.
- Institutional framework and machinery under the Code.
- Broad process for corporate insolvency resolution process.
- Role of insolvency professionals in corporate insolvency resolution process.

Stay informed about the Insolvency and Bankruptcy Code and gather insights into how it may affect your decisions for your organization.

# Asia Pacific Tax

## Indirect Tax

### Human Resources (HR) and VAT / GST: Happy road or hidden bumps?

> 4 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Robert Tsang

Presenters: Weina Ang and Sen Elalingam

The Human Resources (HR) function in many organizations gets more complex year on year, with more and more focus on being lean and efficient in all they do. The tax that touches HR most often is usually Goods and Services Tax or its equivalent – do you understand what these interactions and interdependencies are? With Malaysia introducing new GST rules, countries like Singapore and Thailand are continuing to refine and adapt rules, are you keeping up? We'll discuss:

- What rules are the governing recovery of GST on costs – are you unwittingly building in an element of irrecoverable GST that need not be there?
- Should you use a separate employment services entity for your inbound staff or secondees?
- What are the ramifications for GST costs if you outsource all or part of your HR function?
- The road map and where all the hidden traps are?

Understand the interactions and interdependencies between HR and tax and how they may affect your organization.

## International Tax

### Inbound investment into Vietnam: A clear view of the recent developments

> 9 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Rohan Solapurkar

Presenters: Tuan Bui and Dion Thai

In 2017, we will see the most significant changes to Vietnam's tax regime for at least the last 10 years. The new Transfer Pricing Decree as well as additional documentation requirements will include significant new rules and restrictions on tax deductibility for corporate income tax purposes, including for interest and services fees. Tax audits and investigations continue to grow with a 20% increase planned for 2017. The reduction in government revenues and increased expenditure has seen tax audits identified as a key source to fill the gap. Tax on the transfer of shares has also been found to be a significant source of revenue for the government. We'll discuss:

- An overview of investment structures into Vietnam.
- Changes regarding representative offices including more restricted scope of activities.
- The current and forecast implementation of the OECD BEPS Action Points in Vietnam.
- New tax incentives and their practical implementation.
- Tax audit trends and areas of focus – how to be better prepared?
- New developments concerning the Vietnam tax authorities' approach to the application of tax treaties and transfer pricing.
- Anticipated forthcoming changes.

Keep up to date with the latest developments on inbound investment in Vietnam, and how they may affect your decisions when investing in Vietnam.

## International Tax

### Future of tax in a digital economy: Are you prepared?

> 1 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Claudio Cimetta

Presenters: Li Qun Gao and William Marshall

The digital economy is expanding at a tremendous pace. Innovation and technology have profoundly affected traditional economic sectors, enabling mass customization, increased speed of response to consumer demand, content creation and distribution, as well as intangible transactions. Deloitte experts will explore the challenges facing revenue authorities and taxpayers presented by modern digital economy from a direct tax, transfer pricing, and indirect tax perspective. We'll discuss:

- The risks presented by unilateral corporate tax measures.
- Problems presented by user-supplied content and barter transactions.
- 3D printing.
- The proper characterization of royalty and service agreements.

Join us to learn more about the leading practices that will help to position your organization to navigate the pitfalls of the digital economy with an emphasis on efficiency and risk.

### Future of government incentives in Asia Pacific: What does the future hold?

> 8 June, 12:00 – 1:00 PM HKT (GMT +8)

Host: Natan Aronshtam

Presenters: Albert Baker, Sergio Duchini, Tiong Heng Lee, and Roger Zhou

Countries are actively competing for business investment that will contribute to the local economy, offering incentives to local and international businesses to locate and grow in their jurisdiction. Incentives include tax-based programs and direct grants for investment in particular industries, regions, or companies. We will provide an overview of the innovation landscape including the recent review conducted by the OECD. We'll discuss:

- The role of incentives in achieving public policy.
- Recent developments and trends in government incentives in selected Asia Pacific jurisdictions.
- The potential impact of the OECD BEPS initiative.

Learn about the important developments in regard to government incentives in Asia Pacific and how they may affect your business.

### Inbound investment into the Philippines: Keeping up with the changes

> 29 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Daniel Ho

Presenters: Walter Jr. Abela and Senen Quizon

The Philippines is one of the fastest growing economies in South East Asia, posting an impressive 6.6% growth in the last quarter of 2016. To sustain its growth momentum, it seeks to introduce economic and tax policy reforms to improve the country's investment climate. Sweeping reforms on the tax front are underway to simplify compliance and address the weaknesses in the tax administration. In a move towards simplifying tax compliance, the Philippine tax authority has issued new guidelines which reduce the number of steps and days in registering and securing certifications from the Philippine tax authority, making it easier to do business in the Philippines. Know more about these changes that are taking place in the Philippines. We'll discuss:

- Recent corporate tax developments.
- 2017 Bureau of Internal Revenue (BIR) priority programs (i.e., BIR's internal administrative projects) which would impact multinationals investing into the Philippines.
- New policies on tax assessment (i.e., policy on three-year successive audits of taxpayers, VAT audit program, etc.).

Deloitte experts will share their insights about these recent tax developments, and how they could impact your investment plans into the Philippines.

# Asia Pacific Tax

## Global Mobility, Talent & Rewards

### Global immigration: A new landscape and mindset

> 18 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Mark Wright

Presenters: Fiona Webb and Cecille Yang

In today's environment, immigration has come to the forefront of companies' strategies. In addition to up to date, accurate, and strategic technical advice, other best practices have been seen in this space to help companies be the best in class in managing their immigration programs. In this discussion, we will share some case studies where companies can learn and adopt ways to manage their immigration programs. We'll discuss:

- The importance of real time data and leveraging data analytics as they relate to immigration to make strategic decisions.
- The link between immigration and talent management.
- Keeping up with regulatory changes and thinking holistically.
- Focusing on security, safety, and improving the user experience.
- Optimizing the synergies between immigration and tax.
- Changing the mindset from managing just "global assignees" and focusing on the entire talent pool of an organization.
- Mitigating risk for the employee and employer.
- Challenging and interesting case studies.

Gain insights from Deloitte experts on how multinationals can manage immigration strategies more efficiently and effectively.

## M&A Tax

### Post-BEPS structuring for real estate deals: A focus on China, India, and Japan

> 23 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Danny Po

Presenters: Masamitsu Koshiba, Hemal Mehta, and Simon Tan

In the era of post-BEPS, how would you structure your investment in the real estate sector in India, China, and Japan so as to ensure it does not expose you to unintended tax costs and maximizes opportunity? We'll discuss:

- Overview of a post-BEPS typical investment structure in the real estate sector.
- Taxation of repatriation.
- Tax implications on financing arrangements.
- Exit tax considerations.
- Practical case studies and lessons learned.

Keep up to date with how post-BEPS investment structure in the real estate sector could impact your business.



# Asia Pacific Tax

## China Spotlight

### **China VAT: It's time to reap the savings**

> 20 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Sarah Chin

Presenters: Li Qun Gao and Candy Tang

China VAT is celebrating its first birthday on 1 May 2017. The first 6 months were a rush to understand the rules and then focus on implementation. However, now the dust has started to settle, it is time to focus on planning, identifying, and focus on savings. Whilst there has been a tightening of the zero-rating / VAT exemption preferential treatments, there are other planning opportunities to mitigate the 6% VAT. We will examine industry specific opportunities including the pro rata methodologies to maximize input VAT. We'll discuss:

- Our expectation of the evolution of the Reform in the future.
  - How to implement VAT saving for specified industries.
  - Next steps and solutions to consider in the short term and beyond.
- Understand the potential tax saving opportunities post reform and discover how they may apply to your business.



# Japanese Language Webcasts

## 新外国子会社合算税制を踏まえた日系企業の グローバルタックスマネジメント

> 5月24日 12:00 - 1:00 PM 日本時間 (GMT +9)

司会進行: 結城 一政

講師: 川島 智之、戸崎 隆太

平成29年度税制改正によって大きく変わる外国子会社合算税制に関して、2017年3月に公表の関連政省令の内容を踏まえた制度の詳細および事例を踏まえた実務上のリスクならびに本改正が日系企業のグローバルタックスマネジメントに与える影響について解説を行います。

今回の改正は、日本の多国籍企業の健全な海外展開を支え、その果実の国内経済への還流を促すとともに、租税回避に対してはこれまで以上に効果的に対応していくことを目的としています。近年の企業の事業活動に即した制度の合理化が図られていると評価できる面がある一方、より一層の制度の複雑化に伴い、企業の実務負担の増加や思わぬ課税リスクが生じる可能性があることも事実です。今回の改正を含む近年の国際課税の潮流の変化を受けて、日系企業は今一度、自身のグローバルタックスマネジメントの在り方を見直す必要性に迫られているとも言えます。

本Webcastでは、制度の解説に留まらず、具体的事例の紹介や日系企業のグローバルタックスマネジメントの展望も含めたところで、国際税務専門家がわかりやすくご説明します。

- 新外国子会社合算税制に関する政省令の内容を踏まえた制度の詳細解説
- 新外国子会社合算税制が引き起こす新たな税務リスクに関する事例紹介
- 近年の国際課税の潮流の変化を受けた日系企業のグローバルタックスマネジメントの展望に関する考察

※トピックは変更になる可能性がありますので予めご了承ください。

## Stay tuned



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<http://www.deloitte.com/jp/international-tax>



# Our Presenters

## Asia Pacific Tax

### Australia

Claudio Cimetta, Fiona Craig, Sergio Duchini, David Letos,  
Chris Thomas, Fiona Webb, Mark Wright

### Canada

Natan Aronshtam, Albert Baker

### China

Sarah Chin, Li Qun Gao, William Marshall, Danny Po, Simon Tan,  
Candy Tang, Aaron Wang, Cecille Yang, Roger Zhou

### India

Promod Batra, Jatin Kanabar, Anjali Malhotra, Sameer Maniar, Hemal Mehta,  
Mehul Modi, Sunil Shah, Anand Subramanian, Rahul Tomar

### Japan

Masamitsu Koshiba, Tim O'Brien

### Malaysia

Weina Ang, Sen Elalingam

### Philippines

Walter Jr. Abela, Senen Quizon

### Singapore

Daniel Ho, Tiong Heng Lee, Rohan Solapurkar, Robert Tsang

### Vietnam

Tuan Bui, Dion Thai

## Japanese Language Webcasts

結城 一政 (Kazumasa Yuki), 川島 智之 (Tomoyuki Kawashima),  
戸崎 隆太 (Ryuta Tosaki)



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This video brings you a weekly summary of the significant international tax developments impacting multinationals. It is broadcast every Friday afternoon. Dbriefs Bytes is also available in Chinese and is broadcast every Tuesday. To learn more, visit [www.deloitte.com/ap/dbriefs/bytescentral](http://www.deloitte.com/ap/dbriefs/bytescentral)

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