



# Asia Pacific Tax

## Transfer Pricing

### Intangibles: Opportunities and challenges in a Post-BEPS world

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

Host: Alan Shapiro

Presenters: John Bland and Eunice Kuo

The OECD's final transfer pricing guidance contains a number of new concepts and requirements with respect to the development and exploitation of intangibles. How will these new concepts impact your current and proposed intangibles transactions and structures and what actions should your organization consider? We'll discuss:

- Approaches to consider in analyzing your current and proposed transactions related to the development and exploitation of intangibles.
- Valuation and tax authority approaches to reviewing intangible structures and transactions in Asia Pacific.
- The way forward.

Learn about these developments in transfer pricing for intangibles and find out how your business can effectively manage these transfer pricing opportunities and challenges.

### Country-by-Country (CbC) reporting and new transfer pricing documentation requirements in Southeast Asia

> 15 August, 2:00 – 3:00 PM HKT (GMT +8)

Host: Stuart Simons

Presenters: Roy David Kiantiong and Joy Mukherjee

The new transfer pricing documentation rules following the OECD's BEPS Action 13 intend to strengthen the quality of documents maintained by the taxpayers and enhance transparency. As the introduction of CbC, master file, and local file requirements is now well underway in a number of the SEA jurisdictions, some companies may require substantial lead time in the implementation processes including commitment and investment in systems and resources. We'll discuss:

- Current status of the new documentation requirements across Southeast Asia.
- Differences in the timing and content of the requirements in specific Southeast Asia countries.
- Systems and process issues that have emerged to date.
- Interaction with existing transfer pricing documentation requirements.

Keep up to date with the latest developments on CbC reporting as well as transfer pricing documentation requirements and how they may affect your organization.

## China Spotlight

### Recent developments in China's enterprise income tax laws and review of significant cases

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

Host: Jie Liang

Presenters: Jean Luo and Apple Tang

The new rules issued by the Chinese State Administration of Taxation (SAT) in the non-residents tax administration area includes very few rules from an international tax perspective. On the other hand, there have been quite a lot of impressive cases that have attracted much attention from the public. What are the new rules that the Chinese SAT is currently contemplating and what are the interesting cases in the non-residents taxation area? We'll discuss:

- Prevailing rule for application of treaty benefits.
- A substantial renewal contemplated by the Chinese SAT of China's withholding at source regime on income derived from within China by non-residents.
- Important cases on GAAR (in particular, indirect transfer) and cross-border special reorganizations.

Learn about the important developments in regard to China's enterprise income tax laws and how they may affect your business.

## Gain insights



### 2017 Asia Pacific Tax Complexity Survey

331 executives across the region participated in the Survey. Responses to the 2017 survey reflect the escalating complexity in the tax environments in Asia Pacific jurisdictions in the three-year period since the last survey. In the shifting sands of tax policies, respondents are increasingly cautious about their companies' tax strategy with BEPS reforms being translated into domestic legislation in many jurisdictions. Contact your Deloitte contact to explore these observations in further detail.

### 2017年亚太区税务复杂性调查

德勤第三次推出的《亚太区税务复杂性调查》结果显示:

- 税务可预见性是吸引企业投资亚太的关键因素。
- 各国政府和企业均视BEPS为重中之重。BEPS的落地将使亚太区部分国家进行税务法律法规的变革。
- 就中国而言，受访者对于中国大陆税务环境的可预测性分歧较大。中国大陆的税制改革重点在于确保税务统计的透明度，以及税务稽查的效率和质量。

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# Asia Pacific Tax

## Indirect Tax

### Australia's new B2C GST rules and New Zealand's approach: Revolution or evolution coming to a country near you?

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

Host: Robert Tsang

Presenters: Allan Bullot and Jonathan Paul

Australia brings in new B2C GST rules from 1 July this year. What do they mean for you and your business? Is it really B2C only? Are B2B transactions affected? Do the new rules cover both goods and services? Many other countries are following suit with similar B2C VAT and GST rules. We'll discuss:

- Overview of the new rules.
- What will New Zealand's approach be?
- What strategy should your business adopt to cope as the new B2C rules spread across VAT / GST systems in Asia Pacific?

Join our Deloitte specialists from Australia and New Zealand to learn more about the new B2C GST rules that could impact your business.

## India Spotlight

### Hot issues in India: Secondary adjustments and interest limitations

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

Host: Rohinton Sidhwa

Presenters: Sanjay Kumar and Radhakishan Rawal

Two legal provisions have been introduced in India that are likely to have far reaching implications for multinational enterprises (MNEs) with respect to their intragroup transactions. First, introduction of a secondary adjustment pursuant to a transfer pricing addition and the second, an interest deduction limitation, prompted by BEPS Action 4. Both of these provisions are intended to align Indian tax laws with OECD guidelines and international best practices. Secondary adjustment also addresses the issue of physical movement of cash to correct the negative impact such transfer pricing additions have on foreign currency reserves of the country. The interest rate limitation applies even when guarantees are provided to a third party lender. We'll discuss:

- An overview of rules and regulations under both the statutory provisions.
- Unclear technical aspects and interpretations.
- Practical challenges in adoption and implementation.
- Provide guidance on tweaking transfer pricing policies by MNEs for risk mitigation.

Join us to understand the various nuances of the new provisions and how to prepare yourselves for compliance.

## Stay informed



The introduction of GAAR recognizes that it may not always be feasible for the judiciary to address the unforeseen implications of transactions carried out for tax purposes and also the need to provide some semblance on the matter of tax avoidance. Visit [www.deloitte.com/in](http://www.deloitte.com/in) or contact your Deloitte contact to learn more.

### General Anti-Avoidance Rule (GAAR): Applicability and implications

> 24 August, 2:00 – 3:00 PM HKT (GMT +8)

Host: Sunil Shah

Presenters: Pravin Agrawal, Jatin Kanabar, and Pritin Kumar

India has introduced the General Anti-Avoidance Rule (GAAR) effective from 1 April 2017. GAAR is aimed at curtailing tax avoidance in general (in India) and to rein in the innovative tax avoidance arrangements entered into by taxpayers. GAAR provisions vest the tax authorities with wide powers to, inter-alia, disregard, look through or re-characterize, or ignore arrangements etc. What is further concerning is the apparent open-ended residual power in the statute which provides that the tax consequences will be determined in a manner as is deemed appropriate at the option of the Revenue authorities. We'll discuss:

- Overview of GAAR.
- The GAAR provisions and the potential areas of impact.
- Practical case studies illustrating the operation of the GAAR provisions to common tax planning arrangements.
- The way forward.

Learn about the important developments in regard to GAAR and how they may affect your business.

# Asia Pacific Tax

## M&A Tax

### **Tax structuring for real estate transactions in Indonesia, Malaysia, Singapore, and Vietnam in the BEPS era**

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

Host: Daniel Ho

Presenters: John Lauwrenz, Siok Peng Ong, Hoang Phan Vu, and Kwang Gek Sim

In the era of BEPS, how would you structure your investment in the real estate sector so as to ensure it does not expose you to unintended tax costs and maximizes opportunity? In the previous quarter, we illustrated case studies in China, India, and Japan. In this quarter, we will continue the discussion of this topic with a focus on Indonesia, Malaysia, Singapore, and Vietnam. We'll discuss:

- Overview of a 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 BEPS could impact your tax structure in the real estate sector.

## Global Mobility, Talent & Rewards

### **Rewriting the rules for talent management and mobility: Insights from Deloitte's 2017 Human Capital Trends Report**

> 5 September, 2:00 – 3:00 PM HKT (GMT +8)

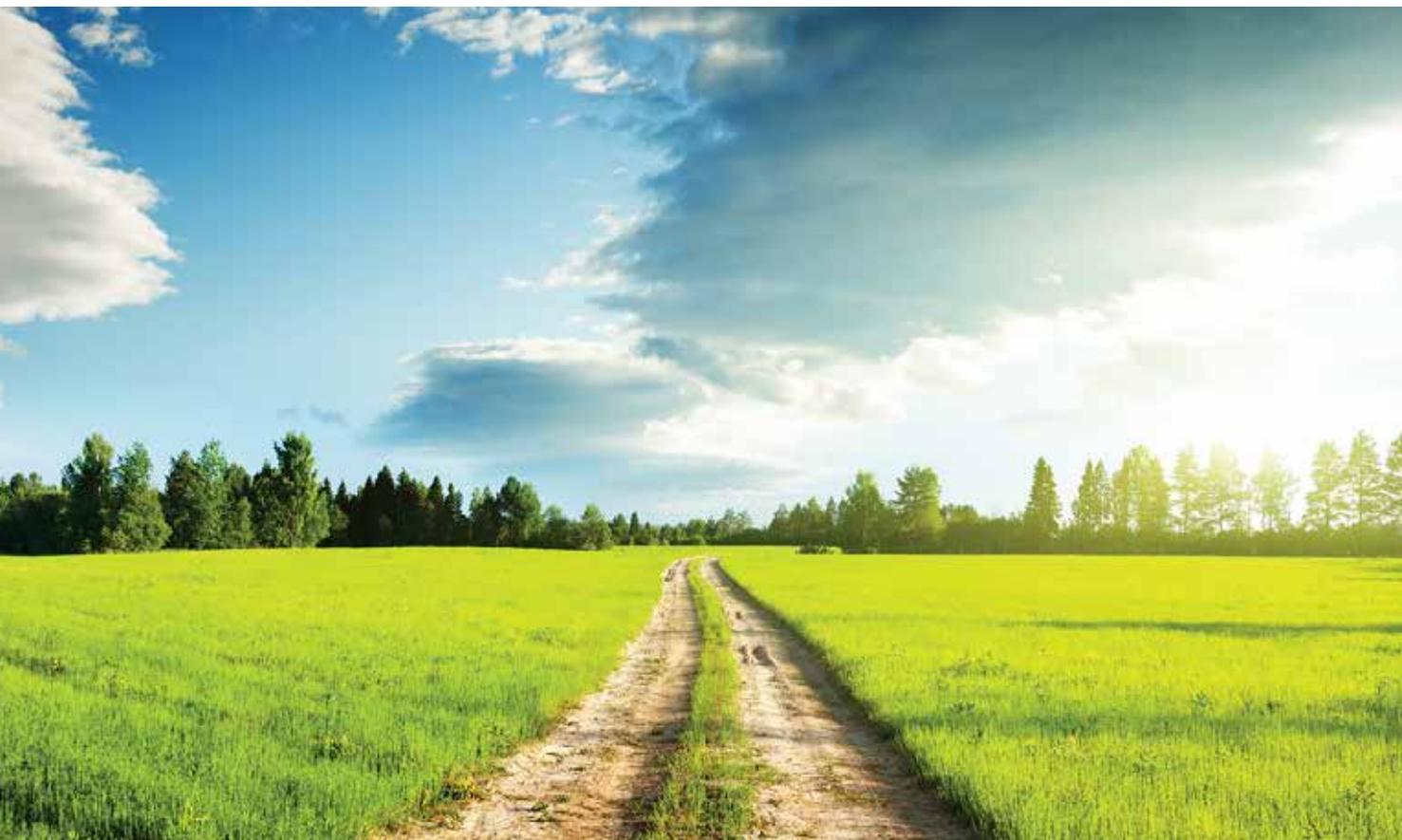
Host: Joseph Logudic

Presenters: Pushp Deep Gupta and Andrew Warneck

Organizations face a radically shifting context in the workplace, the workforce, and work itself. Much of this has been driven by technology advancement. Deloitte's 2017 Global Human Capital Trends Report reveals that business productivity tends not to keep pace with technological progress. So, in a digital age defined by disruptions, fade-out of long-standing business, and the rise of new players, employers need to re-think how they can stay in the game or even create an edge through modern talent management and mobility methodologies. Using case studies from the report, we will explore how organizations are replacing structural hierarchies with networks of agile and powerful teams, how employees also enjoy faster and more promising career progression, taking advantage of the broader exposures, and removal of geographical boundaries. We'll discuss:

- Digital workplaces and workforces.
- Making talent mobility a core value.
- Data analytics to find, attract, and place people globally.
- Employee experience for cultural change, engagement, productivity, and growth.

Stay ahead of these human capital trends, explore how they are changing across the region, and the "new organization".



# Asia Pacific Tax

## International Tax

### **Inbound investments into Japan: Practical insights on recent developments**

> 12 September, 2:00 – 3:00 PM HKT (GMT +8)

Host: David Bickle

Presenters: Lars Dahlen, Brian Douglas, and Tim O'Brien

Japan remains a strategic market for investment for many companies and investors, but concerns over the country's economic recovery persist. Under the monetary and fiscal policies, and structural reforms of Abenomics, recent Japanese tax reform legislation has been aimed to encourage greater foreign investment into Japan. Most notable has been the steady decline in the corporate income tax rate and domestic rules that exempt foreign investment from taxation in Japan. The recent tax reforms have also introduced a number of the initiatives recommended under BEPS project, including rules on the taxation of the digital economy, hybrid instruments, transfer pricing documentation and country-by-country (CbC) reporting, and in the latest 2017 Tax Reform, an over-haul of Japan's CFC rules. We'll discuss:

- An overview of investment structures into Japan.
- Update on current implementation of the BEPS Action points in Japan.
- Tax incentives and their practical implementation.
- Tax audit trends and areas of focus.
- Tax treaty update.
- Future developments and looking toward the 2018 tax reform.

Keep up to date with the latest developments on inbound investment in Japan and hear our insights on the latest Japan tax issues, what to expect, and how to prepare.

### **Inbound investment into Thailand: Exploring current incentives**

> 21 September, 2:00 – 3:00 PM HKT (GMT +8)

Host: Anthony Loh

Presenters: Korneeka Koonachoak and Anthony Loh

After years of politic turmoil, the government of Thailand has succeeded in stabilizing the country and restoring the public confidence. Currently, Thailand is going through a transition towards the fourth industrial revolution or Industrial 4.0, which features the digitization of physical assets and processes. Special tax regimes and various incentives have been introduced by the government of Thailand in an effort to attract high value-added industries into the country. This is one of the reasons why Thailand has been ranked sixth among the world's best up-and-coming economies in 2017 according to a study from U.S. News & World Report. In this discussion, we will share some incentives implemented by government to promote the investment into Thailand. We'll discuss:

- Board of Investment (BOI) incentives.
- Eastern Economic Corridor (EEC).
- International Headquarters (IHQ) and International Trading Center (ITC).

Learn more about the incentives that the government of Thailand is currently focusing on and how they could add value to your investment plan or current investment in Thailand.



# Japanese Language Webcasts

## 世界に広がるVATopia ～インドGSTとアラブVAT導入～

> 8月30日 12:00 - 1:00 PM 日本時間 (GMT +9)

司会進行: 岡田 力

講師: 溝口 史子, 森田 奈保

インドGSTがいよいよ7月1日に導入されます。長年検討されてきた大改正ですが、従来の複数の物品税等がGSTに吸収され、過渡期の混乱が予想されると共に、どの程度の税務事務負担の軽減になるのかが疑問視されています。他の日本企業はどんな対策を講じているのか？正規の大改正の影響を探ります。

更に、中東の国々では2018年1月にVAT導入を目指しています。今までになかった付加価値税制が導入されることから、現地の法人および中東の企業と取引のある企業にとっては、その税制によるビジネスやシステムへの影響を事前に把握しておく必要があります。

本Webcastでは、現地の間接税専門家も交えて、インドGSTとアラブVATをわかりやすくご説明します。

- 日本企業に関連するインドGST税制の概要
- 失敗しないためのインドGST税制対策
- 今後予想される動きと対応
- アラブVAT税制の概要
- 新税制によるビジネスやシステムへの影響

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

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# Our Presenters

## Asia Pacific Tax

### Australia

John Bland, Jonathan Paul

### China

Eunice Kuo, Jie Liang, Joseph Logudic, Jean Luo, Apple Tang, Andrew Warneck

### India

Pravin Agrawal, Jatin Kanabar, Pritin Kumar, Sanjay Kumar, Radhakishan Rawal, Sunil Shah, Rohinton Sidhwa

### Indonesia

Roy David Kiantiong, John Lauwrenz

### Japan

David Bickle, Lars Dahlen, Brian Douglas, Tim O'Brien, Alan Shapiro

### Malaysia

Kwang Gek Sim

### New Zealand

Allan Bullock

### Singapore

Pushp Deep Gupta, Daniel Ho, Siok Peng Ong, Robert Tsang

### Thailand

Korneeka Koonachoak, Anthony Loh, Stuart Simons

### Vietnam

Joy Mukherjee, Hoang Phan Vu

## Japanese Language Webcasts

岡田 力 (Chikara Okada), 溝口 史子 (Fumiko Mizoguchi), 森田 奈保 (Naho Morita)



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