



Sparking innovative ideas

Asia Pacific Webcast series

Program Guide
January - March 2018

Asia Pacific Tax

International Tax

Inbound investments into Taiwan: Practical insights on recent developments

> 23 January, 2:00 – 3:00 PM HKT (GMT +8)

Host: Leonard Khaw

Presenters: Ping Gwo, Andrew Hsu, and Amber Li

In 2017, Taiwan Ministry of Finance (MOF) introduced a series tax reforms that will have an impact on investment into Taiwan beginning from 2018 tax year. The recent tax reforms not only include the abolition of the dividend imputation system, but also have introduced a number of the initiatives recommended under the BEPS project, including rules on the taxation of the digital economy, transfer pricing documentation requirements, etc. We'll discuss:

- Recent reform developments in Taiwan, including the update on the abolition of dividend imputation system and implementation of the BEPS Action points in Taiwan.
- The impact of those reforms on Taiwan inbound investment.
- Opportunities and challenges.

In light of the changes from the 2018 tax year, keep up to date with the latest developments on inbound investment in Taiwan and hear our insights on how they may affect your business, what to expect, and how to prepare in advance.

Inbound investment into Korea: A clear view of the recent developments

> 6 February, 2:00 – 3:00 PM HKT (GMT +8)

Host: Sunny Kim

Presenters: Jimmy Lee and Shin Ho Lee

Significant developments in Korea have caused an impact on inbound investment into the country, including the 2018 tax proposals that include implementation of certain BEPS action plans. We'll discuss:

- Overview of the selected proposed changes to Korean tax legislation in 2018 which may have implications on foreign inbound investors in Korea.
- Implementation of various BEPS Actions under the Korean domestic tax legislation.
- Recent decisions from the Tax Appeals and Supreme Court case.

Discover the latest inbound investment climate in Korea, and what might affect your tax positions when investing in Korea.

2018 Japan Tax Reform Proposals: Broad base, low rates

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

Host: David Bickle

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

With continued low unemployment, a rising stock market and signs that persistent wage and price deflation may finally be easing, Japan's economy is benefiting from the improving global economic outlook and sustained financial stimulus from the government and central bank. The 2018 Tax Reform proposals issued by the ruling parties of the Japanese government on 14 December 2017 continue to reflect these efforts to promote economic growth under the government's stimulus program, known as Abenomics, and to implement various tax measures. We'll discuss:

- Key proposals in the 2018 tax reform, including Corporate Income Tax (CIT) rates, R&D and other incentives, implementation of BEPS measures, such as Action 7 expanding the definition of permanent establishment to include commissionaire arrangements and certain contract agent and other related party activities.
- Transfer pricing documentation guidance from the Japanese National Tax Agency.
- 2017 developments in Japan's Treaty network.
- Customs and Trade issues.

Join us to learn more about these key proposals in the 2018 Japanese tax reform and other recent notable tax and legal updates that may impact multinational enterprises doing business in Japan.



Asia Pacific Tax

India Spotlight

India Budget 2018: What's next on the cards?

Date and time to be confirmed

The last fiscal year witnessed a slew of reforms on the tax and regulatory front. With the current government entering its penultimate year, the trend of reforms is set to continue. After successfully implementing the Goods and Services Tax (GST) regime in India, the government has now set its sights on overhauling the direct taxes law covering income tax. The release of the final rules on country-by-country (CbC) reporting and master file requirements in India are significantly aligned with BEPS Action 13 guidance, reflecting India's commitment to global consistency. GST, Real Estate Regulation Act (RERA), demonetization, bankruptcy code, and recapitalization of bonds of public sector banks (PSBs) are challenging old practices and transforming the way India is doing business. In these times of massive reforms, interest is further mounting to see what's next on the cards. We'll discuss:

- Emerging opportunities in Budget 2018.
- Analysis and impact of new tax proposals on your business.
- The way forward.

Gain insights from Deloitte experts with an in-depth analysis of the 2018 India Budget.

Re-thinking the inbound investment strategy in India: The dawn of a new era

> 25 January, 2:00 – 3:00 PM HKT (GMT +8)

Host: Anis Chakravarty

Presenters: Pritin Kumar, Vishal Palwe, and Peter Willeme

India's tax treaties with Mauritius and Singapore were amended to withdraw the exemption from capital gains arising from disposal of shares of an Indian company. The capital gains exemption stands withdrawn in respect of investments made on or after 1 April 2017. The investments made till 1 April 2017 are grandfathered. Going forward, the foreign investors may have to evaluate other jurisdictions for investing in India. This is further complicated by the introduction of the general anti-avoidance rule (GAAR). We'll discuss:

- Overview of India's revised tax treaties with Mauritius and Singapore.
- Comparative evaluation of jurisdictions for investing into India.
- The impact of GAAR on inbound investment structures.
- The way forward.

Learn about the upcoming investments opportunities in India and how these changes will affect the future landscape.

New perspective to Permanent Establishment: Unsettling the past

> 22 March, 2:00 – 3:00 PM HKT (GMT +8)

Host: Hemal Zobali

Presenters: Jimit Devani and Hemal Zobali

The concept of Permanent Establishment (PE) holds a vital place in determining taxability of a non-resident in a source state. Recently, the Supreme Court of India in the case of Formula One World Championship Limited (FOWC) and E-funds IT Solution Inc. (E-funds) has pronounced certain key principles with respect to PE and its determination. We'll discuss:

- FOWC case.
 - Fixed place PE: Formula 1 race track
 - Application of "time" condition to a repeated, short-term activity
- E-funds case.
 - Fixed place PE: provision of support services by Indian affiliate
 - Indian subsidiary should not cause a PE merely because of interaction or cross transaction with the foreign parent company
 - Profit attributable to PE
- Practical implications of the two cases.

Find out about the latest Indian Supreme Court thinking on the issue of PE status.



Companies have implemented Goods and Services Tax from 1 July 2017 independently or with some support from outside. However, it is important to ensure that the envisaged plan has been implemented well. Key determinant would be to see whether the implementation has percolated seamlessly down the entire organization. Visit www.deloitte.com/in or contact your Deloitte contact in India to help you evaluate effective implementation of GST plan.

Asia Pacific Tax

Transfer Pricing

Operational transfer pricing: Exploring the opportunity for business

> 22 February, 2:00 – 3:00 PM HKT (GMT +8)

Host: Fiona Craig

Presenters: Vincent Geluwie, Stuart Osborne, and Priscilla Ratilal

Operational Transfer Pricing (OTP) is a critical issue for many companies with material levels of cross border trade. Very few companies currently do this well, and Excel spreadsheets still dominate the process. The potential reach of OTP into business processes and systems is becoming a significant improvement opportunity for many companies. There is a lot of scope for either end-to-end process improvement or automated solutions, such as spanning processes and controls, data and management, and people and technology. We'll discuss:

- Assessing process risks to establish a robust controls framework for operational transfer pricing.
- Use of the right people with the required skills and knowledge to execute the process.
- Obtaining accurate, complete, and timely financial data.
- Putting the right tools and technology in place to enable an end-to-end process.

Join us to hear how new tools and processes can help your business overcome OTP issues.

Common pitfalls of transfer pricing for in-house tax teams

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

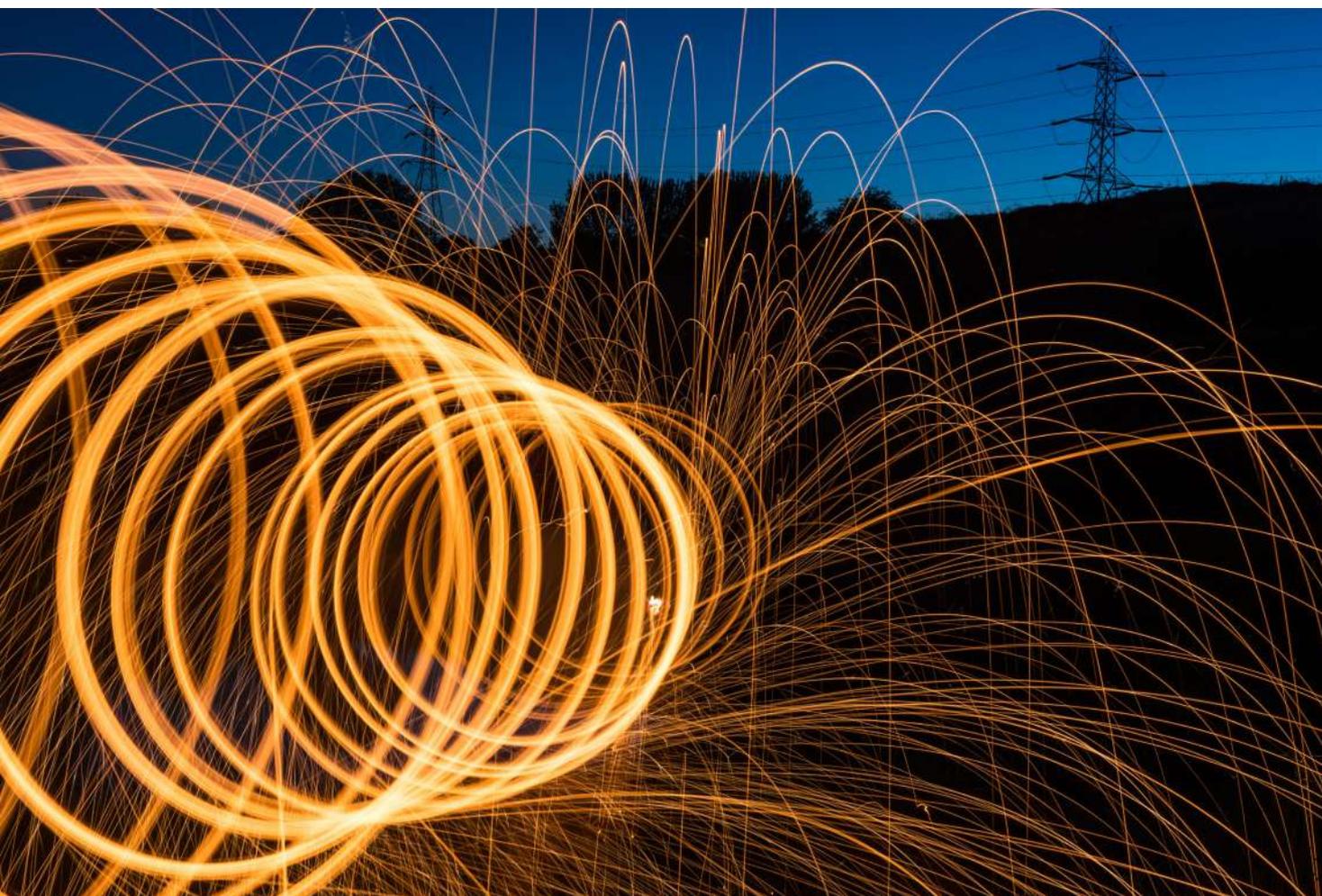
Host: Theresa Goh

Presenters: Alisa Arechawapongsawat, Bhupendra Kothari, and David Letos

Transfer pricing has moved from being a specialist area for dedicated practitioners, to a broad scope international tax issue that impacts all tax professionals. In-house tax and finance teams have noted the challenge of keeping abreast of all the technical and practical aspects when transfer pricing is not their specialist area. An understanding of some common pitfalls that our experts see and advice on how to avoid or successfully manage through can be a useful transfer pricing "intensive" for those requiring a general level of knowledge in their role. We'll discuss:

- Common pitfalls in advising the business on the pricing of new inter-company transactions.
- Simple mistakes to avoid in the ongoing management of transfer pricing documentation.
- Challenges with benchmarking studies and economic analyses.

Join us to raise your awareness of some commonly occurring issues and learn how to mitigate them.



Asia Pacific Tax

Country Focus

Minimizing Taiwan income tax exposure on outbound service fees

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

Host: Arthur Chen

Presenters: Andy Hsu and Sara Liu

Taiwan's income sourcing rules have always been a controversial issue in cross-border transactions, particularly with transactions relating to the provision of services. It is a common issue when multinational companies allocate expenses or charge fees to their Taiwan subsidiaries or unrelated Taiwan clients. Despite the issuance of the Assessment Rules in 2009, in practice the Taiwan tax authorities do not readily agree to a foreign entity's position that the relevant income is non-Taiwan sourced and thus should be exempt from the 20% withholding tax. However, we have experienced a number of client cases in which the tax authorities have agreed to either an exemption from the withholding tax or an apportionment treatment to reduce the effective tax rate in Taiwan. We will discuss the following opportunities:

- Income deemed as non-Taiwan sourced.
- Taiwan sourced income with contribution rate or deemed profit rate applied under article 8 of the Taiwan Income Tax Act (TITA).
- Taiwan sourced income and deemed profit method applied under article 25 of TITA.

Learn about the latest mindset of Taiwan tax authorities in connection with the recognition of Taiwan sourced income and planning opportunities that may be available before or after transactions taking place to mitigate the Taiwan income tax exposure.

Indirect Tax

BEPS and indirect tax: Devil or angel in the details?

> 13 March, 2:00 – 3:00 PM HKT (GMT +8)

Host: Neeru Ahuja

Presenters: Bela Sheth, Jun Takahara, and Robert Tsang

Countries around Asia Pacific are starting to take steps to introduce new rules around BEPS Actions and Indirect Tax. New B2C VAT / GST and Customs rules for services and goods are bedding down in many jurisdictions. How are establishment rules evolving and does a VAT registration give rise to a corporate tax permanent establishment? Do the same principles apply to Indirect Tax concepts of "connection" with a country, "fixed establishment", "business establishment", and most "closely associated" rules? Are there Indirect Tax aspects to consider, with respect to transfer pricing requirements? We'll discuss:

- Case studies from countries within Asia Pacific including Australia, New Zealand, Japan, Korea, and Taiwan.
- Impacts on permanent establishment that have significant VAT and customs duty implications.
- VAT / customs duty aspects on transfer pricing requirements.

Learn about the heights and dive into the depths on these new rules. Devil or angel, understand impacts on your business and supply chain.

Global Mobility, Talent & Rewards

Digital tax and employees: The future is now

> 15 March, 1:00 – 2:00 PM HKT (GMT +8)

Host: Stephen Coakley

Presenters: Elizma Bolt and Donna Rubbo

We are in the midst of significant technological and digital disruption and very much entering an era of unprecedented change in the way services are delivered and received. Professional services and the tax and mobility professions are not immune from this change and in fact, many see this space, along with Government as an early and very opportunistic environment for innovators. In fact, much of this change and innovation is already well underway. The presentation will be focused on the following trends within global mobility and taxation. We'll discuss:

- Automation.
- Employee experience.
- Digital innovation.
- Data and transparency.

In this session, we will explain each trend with our experiences and live examples, discuss barriers to success, and explore the practical and aspirational approaches to digital transformation.

普通话网络讲座 Chinese Language Webcasts

未雨绸缪:环保税开征带来的影响及应对分析

> 1月18日上午11时—下午12时 香港/北京时间 (GMT +8)

主持人: 宫滨

主讲人: 段从军及龚海川

2016年12月25日第十二届全国人民代表大会常务委员第二十五次会议通过了《中华人民共和国环境保护税法》，规定自2018年1月1日起对直接向环境排放应税污染物的企业事业单位和其他生产经营者征收环境保护税(以下简称“环保税”)。2017年6月26日，财政部、税务总局和环境保护部发布了《中华人民共和国环境保护税法实施条例(征求意见稿)》，正式实施条例即将发布。在环保税开征的大背景下，企业如何管理好自己的研发活动以减少应税污染物的排放，如何满足条件以享受环保产业的相关税收优惠，成为环保相关行业的普遍关注话题。基于此，我们将对业界普遍关注的以下话题进行深入分析讨论：

- 环保税介绍。
- 排污企业和环保企业的研发费用管理。
- 环保相关税收优惠及风险管控。

请参与此网络讲座，从容应对环保税开征带来的重要影响。

德勤智慧税务—企业所得税申报及管控系统 (CCS) 服务

德勤自主研发并推出德勤智慧税务系列之“企业所得税申报及管控系统”(Deloitte Insight Tax – Corporate Compliance System, “CCS”)，是一项针对企业所得税汇算清缴工作及企业所得税相关风险的软件，将成为企业更高效、更完整、更前瞻的所得税申报及风险管控小帮手。

请访问www2.deloitte.com/cn/zh/CCS，进一步了解CCS。

Deloitte Insight Tax – Corporate Compliance System (CCS)

The self-developed Deloitte Insight Tax – Corporate Compliance System (CCS) is an effective and efficient EIT filing and risk control system software especially designed for EIT annual filing and EIT related risk management. It is a little helper in EIT annual filing and risk control with greater efficiency, integrity, and vision.

Visit www2.deloitte.com/cn/zh/CCS to learn more about CCS.

Japanese Language Webcasts

中国での外国籍個人に対する個人所得税管理強化: 動向と挑戦

> 2月7日 12:00 – 1:00 PM 日本時間 (GMT +9)

司会進行: 浦野卓矢

講師: 板谷圭一、崔維萍

近年、中国国家税務総局は完全な税務コンプライアンスの構築を重視してきています。その中で、税務管理改革の重要な一環として、2016年に全国範囲で新しい個人所得稅システムである金税三期システムを導入し、外国籍従業員に対する個人所得稅の徴収管理により一層力を入れています。同時に、外国籍従業員の役務提供活動に対する恒久的施設(PE)について、各地方税務局が国家税務局との情報交換等を講じて、長期出張者の個人所得稅申告状況に対する日常検査も頻繁的に行っています。

本Webcastでは、最近注目されているホットトピックスをご紹介するとともに、最新の事例を示しながら、以下のポイントを解説致します。

- 金税三期の導入に関わる個人所得稅管理の傾向
- 個人所得稅に関わる最近の注目点と調査の動向
- 短期出張者に関わるPE及び個人所得稅課稅の動向
- 会社としての対応方法及び取るべき措置



Our Presenters

Asia Pacific Tax

Australia

Elizma Bolt, Stephen Coakley, Fiona Craig, Vincent Geluwie, David Letos, Stuart Osborne, Priscilla Ratilal, Donna Rubbos

China

Leonard Khaw

India

Neeru Ahuja, Anis Chakravarty, Jimit Devani, Bhupendra Kothari, Pritin Kumar, Vishal Palwe, Bela Sheth, Peter Willeme, Hemal Zobali

Japan

David Bickle, Lars Dahlen, Brian Douglas, Tim O'brien, Jun Takahara

Korea

Sunny Kim, Jimmy Lee, Shin Ho Lee

Malaysia

Theresa Goh

Singapore

Robert Tsang

Taiwan

Arthur Chen, Ping Gwo, Andrew Hsu, Andy Hsu, Amber Li, Sara Liu

Thailand

Alisa Arechawapongsawat

普通话网络讲座 Chinese Language Webcasts

段从军 (Alex Duan), 宫滨 (Charles Gong), 龚海川 (Henry Gong)

Japanese Language Webcasts

浦野卓矢 (Takuya Urano), 板谷圭一 (Keiichi Itaya), 崔维萍 (Wei Ping Cui)



About Dbriefs

Anticipating tomorrow's complex issues and new strategies is a challenge. Sparking innovative ideas with Dbriefs that give you valuable insights on important developments affecting your business.

- Informative, with a variety of timely, relevant business topics aimed at an executive-level audience.
- Interactive, with immediate and measurable feedback through polls and surveys, including real-time benchmarking with your peers.
- Convenient, one hour live webcasts in the comfort of your own office.
- Flexible, offering archived webcasts available anytime, from anywhere, for 180 days after the live presentation.
- Educational, with Continuing Professional Education (CPE) / Continuing Professional Development (CPD) credit available towards career development (only available in some jurisdictions).

How to join Dbriefs

1. Visit www.deloitte.com/ap/dbriefs
2. Click on "Join Dbriefs" in the right-hand column.
3. Enter your profile information.
4. Using the menus, select the webcast series that are right for you.
5. Submit your profile.

Once you are a Dbriefs subscriber, you can sign up for individual webcasts via registration emails for your chosen series. After you register for your first webcast, you will have access to our Express Registration, which allows you to save time by registering and logging in to future webcasts using only your email address.

如何加入Dbriefs德勤在线

1. 访问 www.deloitte.com/ap/dbriefs
2. 点击网页右边栏目的 "Join Dbriefs"。
3. 填写所需资料。
4. 从目录中选取适合您的网络讲座系列。
5. 提交资料。

加入Dbriefs德勤在线后，您可以透过注册电子邮件的链接登记参加网络讲座。您只要注册过一次网络讲座，日后只需输入邮箱地址便可快速登记及参加其他网络讲座，省时方便。

Dbriefsにユーザー登録するには

1. 下記のURLにアクセスしてください。 www.deloitte.com/ap/dbriefs
2. 右コラムにある "Join Dbriefs" をクリックしてください。
3. ユーザー情報を入力してください。
4. メニューの中から興味のあるWebcastのシリーズを選んでください。
5. ユーザー情報を保存して終了してください。

一度Dbriefsにユーザー登録をすると、以降、登録したメールアドレスのみで各Webcastへの登録が可能になります。なお、初回のWebcast登録時のみ、個人情報の入力が必要ですが、2回目以降は「クイックログイン」にメールアドレスを入力するだけで、Webcastに登録することができます。

CPE / CPD credits

You can request a Dbriefs Asia Pacific Attendance Record for webcasts you have attended. Visit www.deloitte.com/ap/dbriefs/cpe to find out the eligibility requirement in your jurisdiction and how to request the attendance record.



Deloitte.

About Deloitte

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"), its network of member firms, and their related entities. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as "Deloitte Global") does not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited, its member firms, or their related entities (collectively, the "Deloitte Network") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser. No entity in the Deloitte Network shall be responsible for any loss whatsoever sustained by any person who relies on this communication.

© 2018. For information, contact Deloitte Touche Tohmatsu Limited.

This is printed on environmentally friendly paper.

Dbriefs Mobile



Watch Dbriefs live and archived webcasts, and Dbriefs Bytes on iPad, iPhone, and Android devices anywhere at your convenience. Stay connected with the most topical business issues at your fingertips while you are in transit at the airport, on the plane, commuting in the subway, or even at the gym. To learn more, visit www.deloitte.com/ap/dbriefs/mobile

Dbriefs Bytes • Dbriefs 微播



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

Dbriefs微播每周解读影响跨国经营企业的国际税收发展新动向。这视频将于每周二上午播出。Dbriefs微播内容跟上周五播出的Dbriefs Bytes (英文版) 内容相同。如需了解更多信息，请访问 www.deloitte.com/ap/dbriefs/chinesebytes