

**Sparking innovative ideas**

Asia Pacific Webcast series

Program Guide  
April – June 2018

# Asia Pacific Tax

## India Spotlight

### Long term capital gains: Impacts on future landscape

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

Host: Amrish Shah

Presenters: Deepa Dalal and Sudhakar Sethuraman

Budget 2018 proposes to radically change the tax treatment of long term capital gains (LTCG) arising from the sale of listed shares and equity-oriented mutual funds. The LTCG from these transactions are currently exempt from income tax subject to payment of securities transaction tax. They are now proposed to be subject to income tax from 1 April 2018. The budget proposals, however, provide a minimum threshold exemption of INR 100,000. Further, appreciation in the value of equity shares until 31 January 2018 is also proposed to be grandfathered. We'll discuss:

- Overview of the proposed amendment.
- Grandfathering provision – benefit of cost step up based on fair valuation.
- Computation mechanics.

Stay updated on what the proposals mean for you and how to make an informed decision regarding investments in India.

## Transfer Pricing

### Transfer pricing and intangibles: Emerging challenges

> 3 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Cam Smith

Presenters: Sanjay Kumar, Kerry Lambrou, and James Zhao

Transfer pricing for intangibles remains a hot and evolving topic amidst the complexities of multinationals' international trade. The OECD provided new guidance following Action 8 of its BEPS initiative, and taxpayers and revenue authorities have now had time to consider the implications of new thinking against previous transfer pricing practices and future business priorities. In this session, we will explore how the OECD guidance is being applied in practice, with some attendant challenges for multinationals. We'll discuss:

- Practical application of the new, broad definition of intangibles and guidance on hard-to-value intangibles.
- Entitlement to intangibles-related returns – aligning transfer pricing outcomes with value creation.
- Determining arm's length royalties and pricing intangible transfers.
- Common areas of intangible-related review and challenge by revenue authorities, and potential impacts on multinationals' global IP strategies under the new landscape.

Join us to keep abreast of developments in this important area of transfer pricing.

## Global Mobility, Talent & Rewards

### Global mobility policy trends in Asia Pacific: An evolution of a new era

> 8 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Kathryn Osborn

Presenters: Sudhakar Sethuraman and Kevin Zhu

The world of mobility is constantly evolving and Asia has a unique blend of cultures, laws, and practices. A "one size fits all" global mobility policy may not be fit for purpose in the region nor work for every country. The global workforce is transitioning from employees and assignees to business travellers, virtual workers, domestic commuters, and international local hires. Organizations need to be agile to deal with the various mobility challenges that come their way. New generations mean new expectations and the mobility employee experience needs to be positive, innovative, and engaging. We'll discuss:

- Agile policies for intra-regional Asia moves.
- Domestic mobility in China.
- Domestic mobility in India.
- Flexibility in the mobility policy.
- Mobility for millennials.

Join us to explore and navigate the changing nature of mobility policies across Asia Pacific and learn how you can create or adapt your approach to be successful for the future.

### Global human capital trends 2018: New rules for the rise of the social enterprise

> 15 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Joseph Logudic

Presenters: Pushp Deep Gupta and Andrew Warneck

Seismic shifts are reshaping the new world of work. What are the top 10 trends that HR and business leaders should know about as they navigate the new landscape in 2018? We'll discuss:

- Is your organization transitioning to the future of work?
- How should you be leveraging digital and technologies like AI to augment human skills?
- How can HR take the lead to help drive stronger C-suite collaboration?
- What are the implications of these trends as they relate to the individual, organizations, technology, and society?

Participants will review results of the 6th annual Deloitte global human capital trends research and how organizations can address human capital issues of the future.



The Union Budget of FY 2018-19 was presented amid concerns regarding subdued economic growth, challenging fiscal situation, and farm distress. While the world packed its punch growing at the fastest pace in five years, India's economy temporarily "decoupled" with growth decelerating to a four-year low to 6.75% in FY 2017-18, according to official estimates. Visit [www.deloitte.com/in](http://www.deloitte.com/in) or contact your Deloitte contact in India to give you a comprehensive insight of Union Budget 2018 and its impact on our economy and industries.

# Asia Pacific Tax

## Indirect Tax

### **GST and VAT in India, Malaysia, and the Middle East: Growth spurts or growing pains?**

> 10 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Sarah Chin

Presenters: Rajeev Dimri, Bruce Hamilton, and Eng Yew Tan

Malaysia's GST hits its 3rd birthday, India's GST is a year old whilst VAT is born in the Middle East in Saudi Arabia and the United Arab Emirates, with Oman and Bahrain slated to become the latest members of the indirect tax club. What are the contrasts in experience across these countries and regions? How have these frameworks evolved differently from the framework laid out in the OECD VAT/GST Guidelines, or the models adopted in Europe and elsewhere across Asia Pacific? We'll discuss:

- Overview and highlights since the introduction.
- Differences in the framework and models across region.
- Identify risks and challenges.
- Potential opportunities and/or implications in the future.

Join us to explore whether the experiences represent growth gains for the economies and authorities, or some form of pain for taxpayers.

### **Managing indirect tax and customs through your supply chain**

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

Host: Meng Yew Wong

Presenters: Senthuran Elalingam, Himanshu Tewari, David Ware, and Dolly Zhang

The introduction and expansion of new indirect taxes across the region coupled with the proliferation of trade agreements has resulted in considerable change across the trade environment over the past few years. The Asia Pacific region is complex and diverse and this is reflected in the manner in which different jurisdictions in the region approach the taxation of trade. It is critical to understand how changes to your supply chain can impact your indirect tax and duty position. We'll discuss:

- Transformation of the trading environment.
- Practical case studies.
- Impacts to the developments in Asia Pacific.
- The way forward.

Join us as we explore how changes in your supply chain can have major trade and indirect tax implications.

### **Indirect tax in the digital economy: Evolving rules in Australia, Japan, and New Zealand**

> 19 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Robert Tsang

Presenters: Allan Bullock, Chikara Okada, and Jonathan Paul

The Japanese Consumption Tax, Australian GST, and New Zealand GST all have at least one thing in common – maturing and developing approaches in taxing goods and services provided via or over the internet. With all three countries focused on creating an equitable indirect tax framework between domestic and overseas businesses, rules have evolved over the last year. Will other countries in Asia Pacific follow these rules? We'll discuss:

- Current overview and framework.
- What are the changes to the current rules?
- Likely opportunities and/or implications for countries in Asia Pacific.
- The way forward.

Stay updated on the evolution or revolution that these changes will bring about in the upcoming year, and how it may impact other countries in Asia Pacific.



# Asia Pacific Tax

## Country Focus

### **New Australian transfer pricing guidance: Rules or restrictions?**

> 17 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: John Bland

Presenters: Emily Falcke, Stephanie Lucas, and Mark Wilkie

The Australian Taxation Office (ATO) has been busy drafting and publishing guidance for taxpayers on a variety of transfer pricing related topics. While the guidance comes in different forms, there is a general expectation that multinationals are familiar with, and acting upon, all ATO views. Some of the guidance might be considered novel in its logic and in its expectations of taxpayers, encouraging multinationals to manage their tax risks to a standard higher than that required by legislation. We'll discuss:

- Marketing and procurement hubs.
- Diverted profit tax.
- Inter-company debt.

Keep up to date with the latest developments in Australia that have wide applicability for multinationals.



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## International Tax

### **Digital taxation: Expansion of source country tax jurisdiction for corporate income tax purposes**

> 24 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Leonard Khaw

Presenters: Rohinton Sidhwa, Cam Smith, and David Watkins

In 2017, the Inclusive Framework on BEPS renewed the mandate of the Task Force on the Digital Economy (TFDE) to continue work on the tax challenges of the digitalized economy. The TFDE is expected to deliver its interim report thereon in April 2018. The EU group that is studying the same issue is due to release its findings and recommendations shortly beforehand. At the same time, an increasing number of countries have begun taking steps towards the implementation of unilateral and uncoordinated domestic measures aimed at taxing digitalized activities and highly digitalized business models. We'll discuss:

- Comment on the reports released by the TFDE and the EU.
- Review the current status of domestic measures that selected major countries have taken, which are aimed at taxing digitalized activities and highly digitalized business models.
- Consider short and longer term tax implications for taxpayers.
- Comment on how taxpayers may prepare themselves for the coming change.

Stay updated concerning measures governments are taking in response to the tax challenges posed by the digitalization of the global economy.

### **Double tax treaties: Update on the significant recent developments in Asia Pacific**

> 5 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Jun Takahara

Presenters: Gokul Chaudhri and Claudio Cimetta

In this session, we will review the major developments relating to Asia Pacific double tax treaties, including the 2017 edition of the OECD Model Treaty and Commentary, developments concerning the Multilateral Instrument in Asia Pacific, and the important court and tribunal decisions of 2017 on treaty interpretation. We will also provide an overview of the significant changes within the Asia Pacific treaty network. We'll discuss:

- 2017 OECD Model Treaty and Commentary.
  - OECD BEPS Project treaty-related measures
  - Non-BEPS changes, including important changes to the Commentary on the "permanent establishment" definition
  - Multilateral Instrument in Asia Pacific
- Important cases on treaty interpretation.
  - Formula One (India): permanent establishment
  - RCF IV (Australia): treaty relief for capital gain
  - Starr International (United States): principal purpose test
- Future developments and impacts in Asia Pacific.

Gain insights on the significant recent developments concerning Asia Pacific double tax treaties.

# Asia Pacific Tax

## M&A Tax

### Tax efficient funding arrangements for M&A transactions in Australia, China, and India

> 26 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Danny Po

Presenters: Enzo Coia, William Lee, and Amrish Shah

Deal flow continues to be strong in Asia Pacific amid the rapid development of BEPS in Australia, China, and India. Tax authorities have been escalating their scrutiny in regard to interest deductions arising from cross border related party M&A funding arrangements. Due consideration should be given to the choice of funding instruments by evaluating commercial requirements and impact on profit repatriation and exit. We'll discuss:

- Recent legislative developments for typical funding instruments (e.g., equity and debt classification, cross currency swaps) used for investments in these countries and cases (including the landmark decision in Chevron in Australia) that could impact investors' funding arrangements.
- Impact of the recent amendments in tax treaties vis-à-vis the funding instruments.
- Restriction on tax deduction for interest paid to overseas related parties.

Hear about key cases in this area and learn ways your organization can structure its Asia Pacific M&A financing tax efficiently.



# 普通话网络讲座 Chinese Language Webcasts

## 最新动态及要点:电力行业税务创新管理

> 6月6日上午11时-下午12时 香港/北京时间 (GMT +8)

主持人:梅红

主讲人:宋颐凝及梅红

近年来,电力行业作为国家重点支持和发展的行业,在推动产业创新升级,带动新兴产业发展和促进经济结构调整等方面发挥着重要作用。面对税收政策和征管环境的变化,建设税务风险管理体系及制度,准确把握税收政策,加强内控管理,是每一个电力企业在日常税务管理中亟需予以重视的工作重点,也是企业有效管理纳税评估和税务稽查风险的必然要求。为了充分运用信息化管理手段加强全税种税务风险管控,提高管理效率,满足电力企业的各项要求,我们可通过智能化和自动化的管理方式以优化税务处理流程,提高企业整体税务管理水平。此次网络讲座我们将讨论:

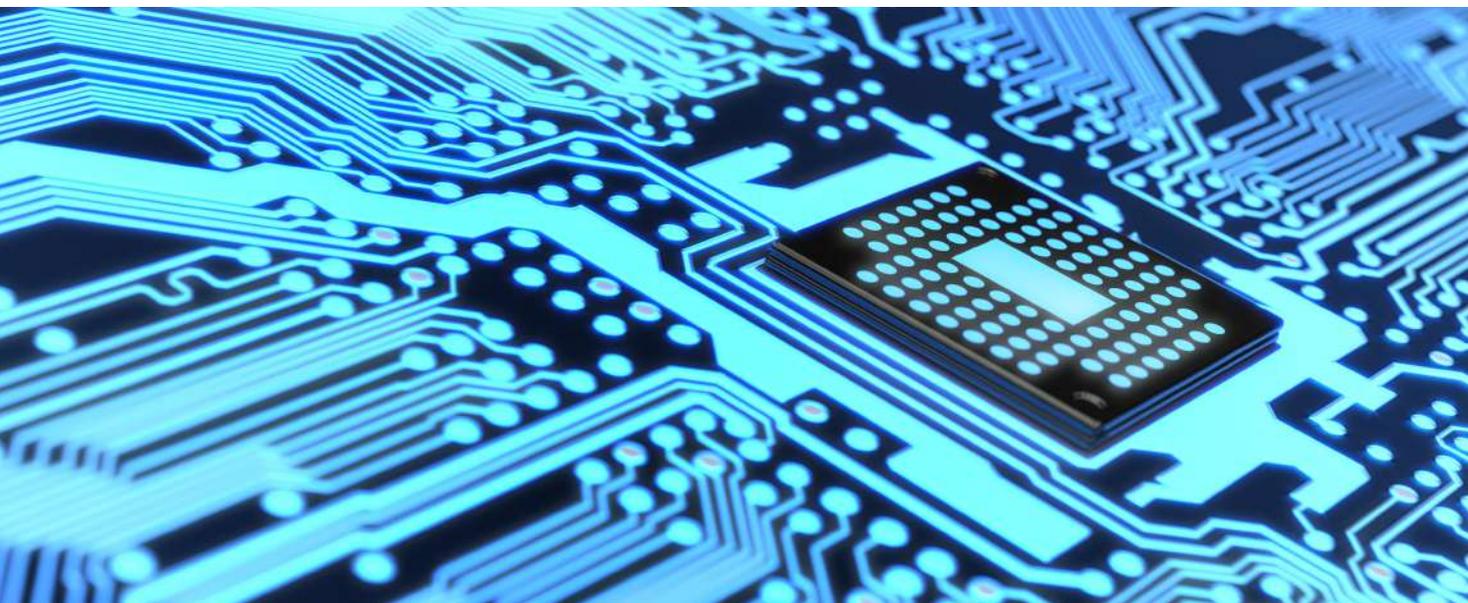
- 电力企业全面税收风险管理。
- 电力企业税务信息化管理。

请参与此网络讲座以了解电力行业的未来趋势。



**"中国CRS规则"落地**

2017年5月19日,国家税务总局、财政部等共同发布《非居民金融账户涉税信息尽职调查管理办法》(简称"中国CRS规则"),根据上述文件,金融机构需要按照规定,通过尽职调查程序识别出"非居民金融账户",按期收集并报送上述"非居民金融账户"的相关信息。此后国家税务总局又先后联合不同监管部门颁布了《银行业存款类金融机构非居民金融账户涉税信息尽职调查实施细则》、《非居民金融账户涉税信息报送规范》等文件。请扫描二维码,进一步了解"中国CRS规则"。



# Our Presenters

## Asia Pacific Tax

### Australia

John Bland, Claudio Cimetta, Enzo Coia, Emily Falcke, Stephanie Lucas, Kathryn Osborn, Jonathan Paul, Cam Smith, David Ware, David Watkins, Mark Wilkie

### China

Sarah Chin, Leonard Khaw, William Lee, Joseph Logudic, Danny Po, Andrew Warneck, Dolly Zhang, James Zhao, Kevin Zhu

### India

Gokul Chaudhri, Deepa Dalal, Rajeev Dimri, Sanjay Kumar, Sudhakar Sethuraman, Amrisha Shah, Rohinton Sidhwa, Himanshu Tewari

### Japan

Chikara Okada

### Malaysia

Senthuran Elalingam, Eng Yew Tan

### New Zealand

Allan Bullot

### Oman

Robert Tsang

### Singapore

Pushp Deep Gupta, Kerry Lambrou, Jun Takahara, Meng Yew Wong

### United Arab Emirates

Bruce Hamilton

## 普通话网络讲座 Chinese Language Webcasts

梅红 (Hong Mei), 宋颐凝 (Susan Song)



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