



Navigating what's next
Asia Pacific Webcast series

Program guide
April – June 2019

Asia Pacific Tax

International Tax

G20/OECD: Tax challenges of the digitalization of the economy update

> 16 April, 2:00 – 3:00 PM HKT (GMT +8)

Host: David Watkins

Presenters: Rohinton Sidhwa and Cam Smith

The G20/OECD Inclusive Framework on BEPS has released important updates on its work to address the tax challenges of the digitalization of the economy. At the same time, we are already seeing a breakout of unilateral measures implemented or under consideration. The OECD is exploring novel proposals, on a without prejudice basis, working towards reaching a consensus-based long-term solution by 2020. Some options extend to the taxation of all multinational businesses, not just those that are highly digitalized. What might this mean for your organisation? Areas under consideration by the OECD include:

- Revised nexus and profit allocation rules which will expand taxing rights for market/user countries.
- Global anti-base erosion proposals to address profit shifting to no or very low tax countries.

Keep up to date with these latest international tax developments and hear our insights on how they may affect your organization.

2019 Korea Tax Reform: Improving efficiency and preventing tax evasion

> 14 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Scott Oleson

Presenters: Young Pil Kim and Sung Soo Woo

Along with the government's effort to boost economic growth and create jobs, the 2019 Tax Reform bill which was approved by the Korea's National Assembly in December 2018 mainly focuses on improving the efficiency of the country's tax regimes, preventing offshore tax evasion, encouraging innovation and job creation, and providing support for low-income taxpayers. Among the amendments, we'll discuss:

- Broadened scope of the definition of PE in line with BEPS action 7.
- Repealed preferential tax regime for foreign-invested companies.
- New rule on taxation of Korea-sourced income for Overseas Investment Vehicles (OIV).
- Limitation on the utilization of net operating losses (NOLs) for Korean branch of a foreign corporation.

Join us in this session to learn more about the updates in the 2019 Korea Tax Reform.



Asia Pacific Tax

India Spotlight

Taxing royalty payments in a digital world: Keeping up with the changes in India

> 7 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Sanjay Kumar

Presenters: Rakesh G. Alshi and Ankit Goel

Digital economy relies heavily on intangibles, big data, and rapidly evolving technological advancements with decreased need for local personnel to perform certain functions. However, user participation is an important value driver for various types of online platforms which contributes in the service-offerings and brand building for a multinational in the digital sector. A group company of a multinational therefore, should be entitled to its share of profits of a business that result from the unrecognized value being created by these companies irrespective of where the business's goods and services are ultimately sold. In recent judgements, Indian judiciary also analyzed the business functions and value drivers of these multinationals in digital space and its Indian arm and re-characterized the payments from India as income from value creation in India. We'll discuss:

- The transformation in business models and the need to reevaluate the value drivers for business towards profit entitlements.
 - Various royalty models and emphasis on variable royalty.
 - Which model is more relevant in the digital world?
 - Current developments from the Asia Pacific region.
- Join us in this session as we learn more about the developments in the digital world and how they may affect you.

BEPS and Indian domestic tax law: Increased exposure to a Permanent Establishment (PE)

> 11 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Sunil Shah

Presenters: Rajiv Bajoria, Himanshu Patel, and Sharath Rao

Amending the Agency PE definition and reducing the tolerance level of the "preparatory and auxiliary" activities to avail exemption from a PE, are key aspects of the Base Erosion and Profit Shifting (BEPS) project and the Multilateral Instrument (MLI) proposals that followed. In addition to putting out its MLI positions to align with BEPS recommendations, India has also amended its domestic tax law which is more expansive in scope. While Indian Courts do consider international OECD/UN guidelines, the defence of companies against PE will need to be based on actual activities on the ground. We'll discuss:

- Certain typical situations such as the provision of marketing support services or commission models in relation to direct offshore sales of goods from outside India.
- The PE exposure on account of inbound expatriate employee's presence in India from group companies.
- Practical case studies.

Gain insights on the significant developments concerning Indian domestic tax law along with treaties and how they may affect your organization.

Global Mobility, Talent & Rewards

Navigate business traveling today and how to stay on top of it

> 9 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Jinho Park

Presenters: Zi Hui Cheng, Deepika Mathur, and Katie Wyatt

As organizations use business travel in an ever increasing manner, authorities around the world are increasing their focus on business travelers, placing greater scrutiny on them and their employers. Additionally, employers are expected to have full oversight of their business travelers such as actively managing consequent compliance risks associated with immigration, tax, social security, payroll, and permanent establishment. Achieving improved compliance requires a holistic approach comprising change management techniques to steer traveler behavior, effective use of technology to manage the large volume of travel data, and downstream processes to undertake compliance actions. We'll discuss:

- How authorities focus on business travel has evolved and the implications.
- Global hotspots and where employer focus on compliance is best placed.
- How organizations are responding to the challenges.
- Building a path to improved compliance and success.

Gain insights from Deloitte professionals on how your organization can keep on top of the shifting landscape, enhance governance, and strengthen compliance in business traveling.



The APA programme has been a key dispute prevention mechanism in the Indian direct taxes set-up. While achieving tax certainty is a key objective of the APA, it is also important that the overall cost of tax compliance is reduced. Introducing flexibility in developing practical approaches for complex transfer pricing issues would be the hallmark of the APA programme. As APA renewals are starting, visit www.deloitte.com/in or contact your Deloitte contact to make sure that time and efforts expended during negotiating the original APA are properly leveraged.

Asia Pacific Tax

Indirect Tax

Reverse charge and overseas vendor registration (OVR): Managing the transition

> 23 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Senthuran Elalingam

Presenter: Richard Mackender

The fast-growing digital economy has prompted countries to act on issues arising from the interaction of its existing GST rules and e-commerce. As IRAS introduces B2B and B2C indirect tax changes in Singapore, we look at the rules and how they compare with other jurisdictions. We will also discuss how businesses can prepare themselves for the introduction of these changes, with effect from January 2020. Businesses will need to consider the potential impact on their current business structure, arrangement and processes. We'll discuss:

- Overview of reverse charge and overseas vendor registration (OVR).
- Comparison with other jurisdictions.
- The way forward.

Join us to understand how these important developments in indirect tax will impact your business.

M&A Tax

Real Estate Investment Trusts (REIT) and Infrastructure Investment Trusts (InvITs): Taking stock and opportunities

> 28 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Sook Peng Chai

Presenters: Paul Culibrk and Kalpesh Maroo

In India, real estate investment trust (REIT) and infrastructure investment trust (InvIT) taxation regimes have been introduced to allow these structures (business trusts) to be set up in accordance with the SEBI (Real Estate Investment Trusts) Regulations, 2014 and SEBI (Infrastructure Investment Trusts) Regulations, 2014, respectively. While the regulations have been in place for some time, India has seen limited adoption of the regimes, particularly in the REIT segment. However, recent activity has rekindled interest in these taxation regimes. We'll discuss:

- An overview of the Indian regulations relating to REIT/InvIT taxation and their gradual evolution in India.
- Tax issues, practical insights, and potential solutions relating to the Indian regulations.
- Perspectives from Singapore and Australia.

Learn about the practical issues as well as possible opportunities in REIT and InvITs that your company may face going forward.



Asia Pacific Tax

Transfer Pricing

Transfer pricing aspects of financial transactions: A moveable feast

> 6 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Ockie Olivier

Presenter: Stan Hales

Around the globe we are seeing the OECD, governments, and tax authorities implementing new rules and publishing new guidance on the transfer pricing (TP) aspects of financial transactions. It is critical that taxpayers understand the various moving parts of financial transactions TP. In this session, we will help you to understand recent changes to the Asia Pacific financial transactions TP landscape and potential implications for how MNCs plan intercompany financing and manage associated TP risk. We'll discuss:

- The status and relevance of the OECD's work on TP aspects of financial transactions.
- The delineation of financial transactions for TP purposes.
- Whether intra-group loans should be treated as debt or equity.
- Pricing intra-group loans, guarantee fees, cash pooling, derivatives, treasury functions, etc.
- New tax authority guidance.
- New interest deductions limitation rules.
- Developing BEPS-compliant global financing policies.

Join us in this session as we discuss the key points that taxpayers should be aware of when addressing financial transactions TP.

China Spotlight

Robotic Processing Automation in China: A revolution and new era

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

Host: Marilyn Lu

Presenter: Roger Qu

In recent years, there has been an increasing demand for Robotic Processing Automation (RPA) through the use of Artificial Intelligence (AI), which made RPA as the hottest topic on the market. RPA can greatly streamline business operations by releasing people from simple and repetitive works to high value-added tasks. Deloitte's Tax Management Consulting team has experience in designing and implementing numerous RPA solutions in China during the past few years. We'll discuss:

- Introduction to RPA and AI.
- Practical RPA cases.
- Implementation of RPA.

Gain insights from Deloitte professionals on the most updated market application of RPA and AI technology, as well as understand how to use RPA to improve work efficiency for your business.



普通话网络讲座 Chinese Language Webcasts

增值税改革进一步深化与新征管环境下的增值税发票管理

> 6月19日上午11时—下午12时 香港/北京时间(GMT +8)

主持人: 高立群

主讲人: 宫滨及唐晔

2019年3月5日, 李克强总理在第十三届全国人大第二次会议上作政府工作报告。报告指出, 2019年将进一步深化增值税改革, 完善增值税制度, 确保所有行业税负只减不增。具体措施包括增值税税率从16%和10%降至13%和9%, 保持6%一档的税率不变, 但通过采取对生产, 生活性服务业增加税收抵扣等配套措施, 确保所有行业税负只减不增。增值税改革将会继续向税率三档并两档, 税制简化方向推进。在减税新规定出台的同时, 我们也关注到税务机关在增值税的征管方面有新的动向, 比如金税三期的推广和对增值税发票相关风险的管理。我们将讨论:

- 增值税最新法规变化。
- 新规对企业的影响。
- 新的增值税征管趋势。
- 增值税发票的相关风险和应对。

请参与此网络讲座, 及时把握增值税新的法规 and 变化趋势, 优化企业税负, 加强增值税内部管理, 降低合规风险。

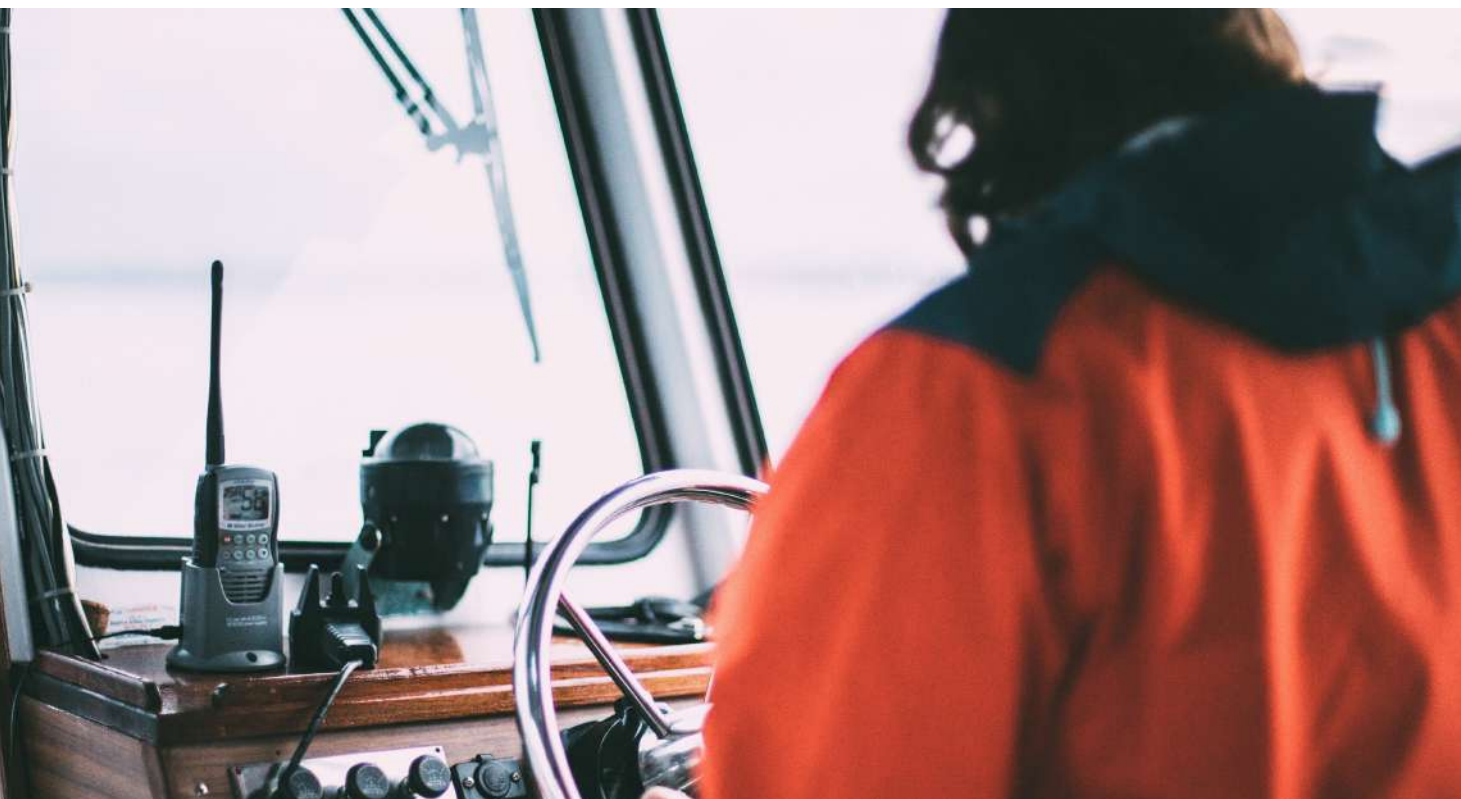


增值税击出减税"组合拳"

如何把握包括降低增值税税率、扩大进项税抵扣等一系列于2019年4月1日起执行的中国增值税减税措施的政策要点? 请点击[此链接](#), 进一步了解相关纳税人应如何着手为新政实施做好准备, 确保相关系统和内控措施的尽早到位, 提升进项税额核算等合规管理的效率, 同时评估梳理其商业影响并确定适当的因应之策。

What's happening with the latest Individual Income Tax Reform of China?

China's State Administration of Taxation (SAT) released several regulations on 21 December 2018 that provide guidance on the enforcement of the newly amended IIT law and its implementation regulations. Three bulletins address various aspects of the new IIT rules, specifically, the use of a tax ID, withholding of tax on income derived by both residents, and non-residents and the self-declaration. Click [here](#) to learn more about the new requirements relating to IIT withholding and self-declarations.



Our Presenters

Asia Pacific Tax

Australia

Paul Culibrk, Stan Hales, Ockie Olivier, Cam Smith, David Watkins

China

Marilyn Lu, Roger Qu

India

Rakesh G. Alshi, Rajiv Bajoria, Ankit Goel, Sanjay Kumar, Kalpesh Maroo, Deepika Mathur, Himanshu Patel, Sharath Rao, Sunil Shah, Rohinton Sidhwa

Malaysia

Senthuran Elalingam

Singapore

Sook Peng Chai, Zi Hui Cheng, Richard Mackender, Jinho Park, Katie Wyatt

Korea

Young Pil Kim, Scott Oleson, Sung Soo Woo

普通话网络讲座 Chinese Language Webcasts

高立群 (Li Qun Gao), 宫滨 (Charles Gong), 唐晔 (Candy Tang)



About Dbriefs

Anticipating tomorrow's complex issues and new strategies is a challenge. Navigating what's next 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.



Dbriefs Mobile



Watch Dbriefs live and archived webcasts 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

Deloitte.

About Deloitte

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

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.