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• Repealed preferential tax regime for foreign-invested companies.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 revaluate 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?
Join us in this session as we learn more about the developments in the digital world and how they may affect you.

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.

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.

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.
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.
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

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和变化趋势，优化企业税负，加强增值税内部管理，降低合规风险。
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

**Chinese Language Webcasts**

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