



Navigating what's next

Asia Pacific Webcast series

Program guide
October – December 2019

Asia Pacific Tax

Transfer Pricing

Hong Kong's new transfer pricing regime: Getting on the right track (Part 2)

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

Host: Leonard Khaw

Presenters: Petrina Chang, Rennike Tse, and Victor Zhang

The Hong Kong Inland Revenue Department (IRD) recently released Departmental Interpretation and Practice Notes (DIPNs) no. 58 and 59 on 19 July 2019, providing guidance to taxpayers on a number of transfer pricing issues contained in the Inland Revenue (Amendment) (No. 6) Ordinance 2018 (IRO). These DIPNs provide guidance in relation to the 3-tier approach to TP documentation and application of transfer pricing principles between associated persons. In this upcoming webcast, we'll discuss how the following items could potentially impact your business in Hong Kong:

- Understanding Master File/Local File requirements in Hong Kong and threshold levels for preparation.
- Country-by-Country reporting obligations, including clarification of secondary filing requirements in Hong Kong.
- Application of the transfer pricing principles as outlined in the IRO, including the operation of the domestic exemptions, and grandfathering provisions.
- Practical considerations when preparing a transfer pricing analysis.

Join us in this session to learn more about the developments listed, how they may affect you and your organization, and prepare for what's next.

Authorized OECD approach (AOA) in Hong Kong: Challenges and opportunities

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

Host: Natalie Yu

Presenters: Jonathan Culver, Samuel Gordon, and John Leightley

Hong Kong has recently introduced the authorized OECD approach (AOA) to branch profit attribution, which is a new transfer pricing requirement. Under the recently introduced AOA, a branch is to be treated as a separate and independent enterprise to its head office with a capital structure comparable to a standalone entity. The application of the AOA is anticipated to result in significant disallowances in deductible funding costs for branches. There is also a planning opportunity to minimize these disallowances, or potentially to claim additional deductions. We'll discuss:

- Overview of AOA.
- The potential impact of AOA and key issues to consider.
- The way forward.

Learn about the important transfer pricing developments in Hong Kong and their potential effects on multinationals.



Asia Pacific Tax

International Tax

Observations of the new economic substance rules introduced in UK overseas territories

> 14 November, 9:00 – 10:00 AM HKT (GMT +8)

Host: Vicky Wang

Presenters: James Dockeray, Anthony Fantasia, and Kayla Laidlaw

In December 2018, Bermuda, the British Virgin Islands, and the Cayman Islands passed domestic economic substance legislation that introduces increased substance requirements for certain entities resident within these jurisdictions. The legislation was introduced in response to concerns expressed by the Council of the European Union (EU) about the absence of clear general legal substance requirements for entities doing business in and through these jurisdictions. The requirements in the legislation were effective 1 January 2019 (with a six-month transitional period for existing entities) and affect certain entities that are engaged in "relevant activities" as defined within the legislation. We'll discuss:

- Overview and background of the legislation.
- Summary of the economic substance requirements.
- Annual economic substance reporting.
- Enforcement and penalties.
- Where do things stand now?
- Our experiences.
- Next steps to consider.

Join our Deloitte specialists and learn more about the requirements and the potential impact on various types of entities.

India Spotlight

International Financial Services Centre (IFSC): New financing opportunities in India

> 28 November, 2:00 – 3:00 PM HKT (GMT +8)

Host: Bahroze Kamdin

Presenters: Vishal Agarwal and Russell Gaitonde

The Gujarat International Finance Tech-city (GIFT) SEZ, is India's first International Financial Services Centre (IFSC) and has been conceptualized as a global offshore financial and IT services hub, a first of its kind in India, designed to compete with other globally benchmarked financial centers around the world. The Indian Government has recently taken several major policy initiatives and tax reforms to boost the attractiveness of operating in the IFSC. We'll discuss:

- An overview of the legislation under which the IFSC operates.
- How it impacts, in particular, the financial services business.
- What are the competitive tax (both direct and indirect) advantages that are now available to financial services businesses.
- How does the structure proposed compare with other international offshore regimes.
- What's next.

Stay informed about the latest developments on the IFSC in India and their potential effects on your organization.



Multilateral Instrument (MLI) is an outcome of BEPS Action Plan 15 of the OECD/G20 Inclusive Framework, which offers solutions for governments to plug loopholes in international tax treaties by transposing results from the BEPS project into bilateral tax treaties worldwide. MLI allows governments to modify application of its network of bilateral tax treaties in a synchronized manner without renegotiating each of these treaties bilaterally. Visit www.deloitte.com/in or contact your Deloitte contact to understand MLI and its impact on Indian tax treaties.

Asia Pacific Tax

Global Mobility, Talent & Rewards

Global payroll: A consolidated approach to manage tax and payroll risks, powered by technologies

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

Host: Kenneth Peh

Presenters: Steve Batrouney, Lily Li, and Aarti Raote

Globalization is making organizations increasingly borderless. Not only would business travelers create additional employment tax and payroll reporting requirements, the payroll operations itself is also shifting to a global or regional model. Is your organization able to keep up with the complex regulatory changes? We'll discuss:

- How the increasing trend of business travelers is heightening the challenges on employment tax and payroll reporting.
- How should organizations prepare before shifting payroll operations to global to ensure achievement of objectives.
- Payroll vendor management and how it helps mitigate payroll risks.
- How technologies enable proactive management of payroll risks and set your organization apart from others.

Gain insights from Deloitte professionals on how your organization can keep on top of the latest employment tax and payroll trends and apply them to your company.



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普通话网络讲座 Chinese Language Webcasts

运筹帷幄，未雨绸缪：年底税务盘点

> 12月18日上午11时—下午12时 香港/北京时间 (GMT +8)

主持人: 徐祖明

主讲人: 张晓洁、俞萌及唐晔

在年底关帐来临之前，我们将为大家对一年中的所得税税收政策的发展变化进行盘点分析，讨论关注年底关帐所需要重视和考虑安排的事项，同时也为下一年度的财务预算和税务规划做好准备。我们将讨论：

- 全球贸易风起云涌：中国海关政策回顾及关税政策解读。
- 减税降费：增值税减税退税及未来发展展望。
- 2019个人所得税改革元年：个税政策梳理与展望及个税申报实务解读。

请参与此网络讲座，共同为年底税务盘点做好准备。



Our Presenters

Asia Pacific Tax

Australia

Steve Batrouney

Bermuda

James Dockeray

British Virgin Islands

Kayla Laidlaw

Cayman Islands

Anthony Fantasia

China

Petrina Chang, Jonathan Culver, Leonard Khaw, John Leightley, Lily Li, Kenneth Peh, Rennike Tse, Vicky Wang, Natalie Yu, Victor Zhang

India

Vishal Agarwal, Russell Gaitonde, Bahroze Kamdin, Aarti Raote

Japan

Samuel Gordon

普通话网络讲座 Chinese Language Webcasts

徐祖明 (Jeff Xu), 张晓洁 (Dolly Zhang), 俞萌 (Irene Yu), 唐晔 (Candy Tang)



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