

## Hong Kong Profits Tax Update

 2.5 CPD Hours

Speakers: Mr Jeremy Choi, Partner, Tax Services, PricewaterhouseCoopers  
 Mr Kenneth Wong, Senior Manager, Tax Services, PricewaterhouseCoopers

Date : Thursday, 11 February 2010

Time : 6:15 pm – 6:45 pm (Registration)  
 6:45 pm – 9:15 pm (Workshop)

Venue : CPA Australia Hong Kong China Division Office  
 20/F Tai Yau Building  
 181 Johnston Road, Wanchai

Language : Cantonese, supplemented with English

Fee : HK\$375 Member  
 HK\$625 Non-Member

Certification : Certificate of Attainment will be issued to participants who have completed the workshop

In recent years, the Inland Revenue Department (IRD) has been tightening its assessing practice in order to improve revenue collection. This can be evidenced by the increasing number of tax investigations and field audit cases. Besides, we see the IRD using anti-avoidance provisions more often to challenge taxpayers' transactions in recent court cases. Internationally, the HKSAR government is taking positive steps to expand its tax treaty network with its trading partners to make Hong Kong more competitive. This will obviously facilitate more cross-border tax planning opportunities.

In this workshop, tax specialists from PricewaterhouseCoopers will share with you their views on the following issues:

### Course Outline:

#### Hong Kong profits tax update and recent cases

- Update on the IRD's assessing practice
- Update on major court decisions and their implications on taxpayers' business and operational models
- Implications of the Revised Departmental Interpretation & Practice Notes No. 21 issued on 4 December 2009 on locality (i.e. source) of profits

#### Cross-border and international tax development

- Update and development of the Hong Kong tax treaty, including the liberalisation of the Exchange of Information article
- Tax-efficient corporate structures through the use of tax treaties
- Update on the application of Hong Kong tax residency certificates for claiming treaty benefits

### About the speakers:

**Mr Jeremy Choi** joined PricewaterhouseCoopers in 1994. He is a Partner in the Tax Services group in Hong Kong office responsible for clients in the consumer and industrial products industries as well as retailing and transportation industries. Jeremy has extensive experience in Hong Kong and regional tax consultancy work, including corporate restructuring and tax-efficient holding structures, regional tax planning, mergers and acquisitions. Jeremy has a Bachelor Degree in Economics and a Degree in Law.

**Mr Kenneth Wong** has over 12 years' experience in providing Hong Kong and regional corporate tax consulting services to a wide range of local and multinational clients in the retail and consumer products, technology and telecommunications industries. He also has extensive experience in tax dispute resolution, corporate structuring, cross-border tax planning and transfer pricing. Kenneth graduated from the Chinese University of Hong Kong with a Bachelor Degree in Business Administration and Finance.

### Enrolment Form (Fax No. 852 2832-9167)

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