



HKICPA seminar: Tightening of Transfer Pricing Regulations on Cross-border Transactions

Programme Code: TFP150707S

China's State Administration of Taxation ("SAT") has continued to focus on strengthening its transfer pricing regulations with the aim to protect China tax revenue. The SAT recently released its Bulletin on Enterprise Income Tax ("EIT") Issues concerning Outbound Payments to Overseas Related Parties (Bulletin [2015] No. 16). This Bulletin formalizes several previously announced positions for dealing with service fees and royalties being paid to overseas related parties.

In this seminar, the speakers will address the latest development on transfer pricing in the PRC including:

- An overview of the cross-border inter-company service transactions commonly adopted by multinational corporations
- Criteria for claiming EIT deduction on cross-border intercompany service fees and royalties under Bulletin 16
- Latest PRC tax policy on cost sharing arrangement
- Case sharing on recent transfer pricing tax matters

Date Tuesday, 7 July 2015

Time 6:30 p.m. – 8:00 p.m.

Venue Hong Kong Institute of CPAs,
27/F., Wu Chung House, 213 Queen's Road East, Wanchai, Hong Kong.

Format Seminar

Language English

Fee

- Taxation Faculty member: HK\$150
- HKICPA member or student; and IA/ HKIAAT member or student: HK\$190 or HK\$180 (online enrolment)
- Non-member: HK\$330

Objectives

- Highlight the latest transfer pricing regulatory development in the PRC
- Analyze the impact of Bulletin 16 on cross-border transactions
- Highlight significant risk areas for cross-border transactions in light of the latest PRC regulatory development

Speakers **Mr. Patrick Cheung**, Tax Partner, Deloitte China
Prior to joining Deloitte, Mr. Cheung was a financial services transfer pricing partner of another Big Four accounting firms in Hong Kong. He began his Big Four international tax consulting career 15 years ago in Canada. Prior to that, he had also worked for the Canada Revenue Agency.

Mr. Cheung's financial institution clients include major international commercial and investment banks, insurance and reinsurance companies as well as asset management firms.

Mr. William Lee, Tax Director, Deloitte China
Mr. Lee has over 16 years of professional experience in advising tax planning, mergers & acquisitions (including due diligence services, tax structuring advice, post deal integration advice, etc.), corporate restructuring and regulatory matters to multinational companies, including private equity, assets management, banks, retail group, and real estate companies, etc.

He also has extensive experiences on advising tax matters in relation to cross-border transactions involving various different industries ranging from manufacturing and trading/retails sectors to financial services. He has served many first class multinational companies and private equity groups.

Participants For those who wish to learn more about the transfer pricing regulations in China

Competency Taxation

Rating Leadership Level (Please refer to the [Institute's online CPD Learning Resource Centre](#))

CPD hours 1.5



HKICPA EVENT ENROLMENT FORM (For Support Programme)

Tightening of Transfer Pricing Regulations on Cross-border Transactions (TFP150707S)

Finance & Operations Department,
Hong Kong Institute of CPAs,
37/F, Wu Chung House, 213 Queen's Road East, Hong Kong

Please click here for online enrolment
(for HKICPA members only)

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Event Information Enquiry:
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Deadline: 7 working days before the date of the programme

No.	Membership		Full Name of Participant(s) (Block Letters)	Company	Email address ^{*(2)} (Block Letters)	Fee		
	No.	Status (1)				Taxation Faculty Member HK\$150	HKICPA member, student /IA/HKIAAT member, student HK\$190	Non- member HK\$330
1								
2								
3								
4								
						Total	HK\$	

* Email address is for enrolment confirmation purpose. Please refer to note (2) for details.

☐ I am unemployed and not working. I am planning to rejoin the workforce.

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- Notes:**
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 - NO REFUND/CANCELLATION will be entertained after the application is processed.
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