



Principles of international taxation

About the topic

Mr. David Smith, senior adviser, tax services at PricewaterhouseCoopers, and a highly respected commentator on Hong Kong and international tax, will discuss some key principles of double tax agreements and examine how those principles interact with the provisions of the Hong Kong Inland Revenue Ordinance, and the interpretational issues or difficulties which may arise. Issues which will be examined include:

- Taxation of business profits, including the concept of permanent establishment
- Taxation of employment income
- Double tax relief
- Transfer pricing and associated enterprises
- Anti-treaty shopping provisions

About the programme

Date	16 September 2010	Time: 7:00 pm – 8:30 pm (Refreshments will be served at 6:45 pm)
Venue	Training Centre, HKICPA, 27th Floor, Wu Chung House, 213 Queen's Road East, Wan Chai.	7:00 pm Opening remarks by chairman
Fee	HKD120 per person for TIG members HKD190 per person for Non-TIG members <i>Not a TIG member? Click here to join.</i>	7:05 pm Presentation
CPD credit	1.5 hours	7:55 pm Q&A session
Language	English	8:25 pm Closing remarks by chairman
Competency	Taxation	Chairman
Rating	Intermediate	Ms. Debbie Annells Convenor of TIG management committee & managing director, Azure Tax Ltd
Application deadline	13 September 2010	

* Please refer [here](#) for descriptions of other competencies and ratings.

About the speaker

David Smith – senior adviser, tax services, PricewaterhouseCoopers

David has many years of experience as a tax adviser covering a broad range of industries and services, although he has a particularly strong background in financial services where he has specialised in banking and fund management (retail, hedge and private equity).

David previously spent seventeen years with KPMG in Hong Kong. In this role, he advised some of the world's largest financial institutions on their tax affairs. This has provided David with an enviable understanding of international tax matters both in terms of local knowledge as well as structuring outbound investments.

Amongst other achievements, David is well known for annually updating *Hong Kong Taxation: Law and Practice* (Chinese University Press) for the seventeen years from 1992 to 2008.

After leaving KPMG in 2003, he continued to advise a number of major institutions on Hong Kong and Asian tax matters before being recruited by PricewaterhouseCoopers to become a partner and head up the financial services tax practice in the Middle East and North Africa region. In that role, he took direct responsibility for co-ordinating the provision of advice across that region for financial services clients. Additionally, he worked directly on the provision of tax structuring advice for clients, predominantly sovereign wealth funds, based in various locations throughout the Gulf region.

David has recently returned to Hong Kong to join PricewaterhouseCoopers as a senior adviser to the tax practice. He brings with him extensive experience on Hong Kong tax matters, global issues of concern to the financial services sector and major international merger and acquisition transactions.

David is a member of Hong Kong Institute of Certified Public Accountants, CPA Australia, and the Taxation Institute of Australia.

Registration

The number of places is limited and in the event of over-subscription, places will be allocated on a first-come-first-served basis with priority given to Taxation Interest Group members.

To register:

- **Online registration:** For the time being, this facility ([click here](#)) is available only to members who are both Institute and TIG members. If you are not both, please reply by post or fax. As seats may still be available if online enrolment is full, please try enrolling by post or fax.
- **By post or fax:** Complete the attached reply slip and return it to the Institute on or before 13 September 2010, together with a cheque made payable to the "Hong Kong Institute of Certified Public Accountants". Fax registration will be accepted for payment by any Visa/Master credit card. Confirmation of registration will be sent by e-mail. If confirmation has not been received by 14 September 2010, please contact Ms May Hung at 2287 7009 / Ms Canace Leung at 2287 7089.



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Enrolment Form *[Click here](#) for online enrolment (only if you are both Institute and TIG member). As seats may still be available if online enrolment is full, please try enrolling by post or fax.

Operation & Finance Department,
Hong Kong Institute of CPAs
37th Floor, Wu Chung House,
213 Queen's Road East,
Hong Kong.
Fax no: 2893 9853

16 September 2010

(Reply on or before 13 September 2010)

FOR OFFICE USE

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Please allow 4 days to process your application. In order not to delay the process, please DO NOT make any enquiries on your enrolment status. You can check it at "[My CPA](#)". Unsuccessful enrolment will be notified before the commencement of the event with full refund.

Please type or print:-

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Company name: _____

Position held: _____ Email: _____

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Additional participant from the same company as the above applicant:

	Name	Institute membership no. (if applicable)	Position
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____

Please "✓" as appropriate

Admission Fee: HKD120 per person (TIG members) X _____ person(s) = HKD _____

HKD190 per person (Non-TIG members) X _____ person(s) = HKD _____

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Notes:

- Enrolments are accepted on a first-come-first-served basis with priority given to TIG members. Telephone reservations will not be accepted.
- Full payment must be made before applications will be processed.
- The closing date for enrolment is 13 September 2010.
- Confirmation will be sent by e-mail, unless your application for registration is unsuccessful. If you have not received any confirmation by 14 September 2010, please contact Ms May Hung, on 2287 7009, or Ms Canace Leung, on 2287 7089.
- Unless the event is cancelled due to unforeseen circumstances, no refunds will be given after applications have been processed.
- Bad weather arrangement: The seminar will be cancelled if typhoon signal no. 8 or above / black rainstorm warning is hoisted, as announced by the Hong Kong Observatory, at or after 2:30 p.m. on the date of event. In the event of cancellation due to bad weather, the admission fee will be refunded.

Payment & Enrolment Status Enquiry: 2287 7381

e-mail: finance@hkicpa.org.hk

Event Information Enquiry: 2287 7009 / 2287 7089

e-mail: mcs.msce@hkicpa.org.hk