

**HKICPA Qualification Programme  
Module D Learning Pack**

**Summary of changes in sixth edition**

Examples and self-test questions have been added or replaced throughout the chapters.

Chapter in sixth edition		Main changes in sixth edition
Chapter	Chapter name	
1	The tax system in Hong Kong	<ul style="list-style-type: none"> <li>Updated DIPN table</li> <li>Updated the tax rates for 2017/18 and onwards and the tax relief for 2015/16 and 2016/17</li> <li>Updated the tax measures proposed in 2017/18 Budget</li> <li>Updated 'expanding the scope for deduction under s.16E', 'changes in stamp duty', 'Tax Information Exchange Agreement and exchange of information' and 'asset management'</li> <li>Deleted 'DIPN 48 – advance pricing arrangement', 'Islamic bonds (sukuk)' and 'tax concession for captive insurers', which are no longer new updates</li> <li>Added 'corporate treasury centre', 'tax treatment of regulatory capital securities', 'base erosion and profit shifting' and 'profits tax concession to qualifying aircraft lessors' as new updates</li> <li>Updated 'value-added tax' and 'tax rates' in Appendix</li> </ul>
2	Administrative procedures under the Inland Revenue Ordinance	<ul style="list-style-type: none"> <li>Updated 'the tax appeal channel'</li> <li>Updated new cases in Appendix</li> </ul>
3	Hong Kong profits tax	<ul style="list-style-type: none"> <li>Added the 'taxation of corporate treasury centres and DIPN 52'</li> <li>Added the 'taxation of regulatory capital securities and DIPN 53'</li> <li>Added the new tax deduction rule in respect of interest paid in the ordinary course of an intra-group financing business</li> <li>Updated new CDTAs signed by Hong Kong</li> <li>Updated status of tax cases</li> </ul>
4	Non-resident persons	<ul style="list-style-type: none"> <li>Added the 'exemption provision for offshore private equity funds and DIPN 51'</li> <li>Updated new CDTAs signed by Hong Kong</li> </ul>
5	Hong Kong salaries tax	<ul style="list-style-type: none"> <li>Updated the allowable deductions for 2016/17 and onwards</li> <li>Updated the personal allowance and tax relief for 2016/17 and 2017/18</li> <li>Updated the progressive tax rates for 2017/18 and onwards</li> </ul>

		<ul style="list-style-type: none"> <li>Updated new cases in Appendix</li> </ul>
6	Hong Kong property tax	<ul style="list-style-type: none"> <li>No significant changes</li> </ul>
7	Personal assessment	<ul style="list-style-type: none"> <li>No significant changes</li> </ul>
8	Hong Kong stamp duty	<ul style="list-style-type: none"> <li>No significant changes except some updates on 'ad valorem duty'</li> </ul>
9	Introduction to tax planning	<ul style="list-style-type: none"> <li>Added new tax deduction rule and related anti-avoidance provisions in respect of interest paid in the ordinary course of an intra-group financing business</li> <li>Added specific anti-avoidance provisions for deductions in respect of regulatory capital securities</li> <li>Updated the tax rules regarding 'assessable profits of non-resident persons regarded as assessable profits of resident persons'</li> <li>Further elaboration on 'limited partner loss relief'</li> <li>Updated the tax initiatives put forward by OECD</li> </ul>
10	Tax investigation and field audit	<ul style="list-style-type: none"> <li>No significant changes</li> </ul>
11	Tax compliance and tax advisory services	<ul style="list-style-type: none"> <li>Updated the tax appeal mechanism</li> </ul>
12	Double taxation arrangements and agreements	<ul style="list-style-type: none"> <li>Updated 'persons and taxes covered' and 'capital gains'</li> <li>Updated 'Tax Information Exchange Agreements' and 'automatic exchange of financial account information'</li> <li>Added 'base erosion and profit shifting'</li> <li>Updated the table summarizing CDTAs that have recently been gazetted / put into force</li> <li>Updated 'other double taxation agreements'</li> <li>Updated the summary of avoidance of CDTAs in Appendix</li> </ul>
13	Overview of China tax system	<ul style="list-style-type: none"> <li>Added the updates on 'environmental protection tax'</li> <li>Reorganised the sections on 'business tax'</li> <li>Removed 'mixed transactions' and 'concurrent activities'</li> <li>Added the latest updates on 'VAT reform programme'</li> <li>Updated the 'individual income tax computation' in respect of a person who can claim qualified charitable donations</li> <li>Updated new CIT rules and regulations</li> </ul>