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# 香港華人會計師公會 The Society of Chinese Accountants & Auditors

(在香港註冊成立之有限公司)

(Incorporated in Hong Kong as a company limited by guarantee)



## How does the tax regime on qualifying corporate treasury centres operate?

(Course Code 課程編號: 4016)

### Highlights: 課程重點:

The new tax legislation on corporate treasury centre (CTC) (The Inland Revenue (Amendment) (No. 2) Ordinance 2016) was gazetted on 3 June 2016. The legislation offers a concessionary tax rate for qualifying profits derived by a CTC in Hong Kong and relaxes the tax deduction for interest expenses in certain circumstances. That said, the legislation also contains some controversial profits tax treatment for interest income and other profits derived from an intra-group financing business. To clarify the interpretation and application of the new legislation, the Inland Revenue Department further issued Departmental Interpretation and Practice Notes No. 52 – Taxation of corporate treasury activity (“DIPN 52”) in September 2016. Our Hong Kong tax professionals will share the key messages of DIPN 52 and its implications to intra-group financing businesses. We will also share our practical experience on how the CTC tax regime could potentially benefit an organisation.

- Overview of the CTC tax regime and the new profits tax treatments for interest income and interest expense for an intra-group financing business
- Major points of DIPN 52 and its key implications to intra-group financing businesses
- Case sharing on how the CTC tax regime could work

### Speaker (s): 講者:

**PwC Hong Kong 羅兵咸永道**

**Charles Chan**  
*Director, Tax services*

**Ricky Chow**  
*Senior Manager, Tax services*

### Date: 日期:

21 November 2016, Monday  
2016年11月21日(星期一)

### Time: 時間:

6.30pm – 8:00pm  
晚上 6:30-8:00

### Venue: 場地:

SCAA Premises (6/F, 88 Lockhart Road, Wanchai, Hong Kong)  
香港華人會計師公會 (香港灣仔駱克道 88 號 6 樓)



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<b>Language:</b> 語言:	Cantonese (with English Handouts) 廣東話授課並備以英文講義
<b>CPD hours:</b> CPD 時數:	1.5 hrs 1.5 小時
<b>Fee:</b> 費用:	HK\$150 for full member/ affiliate/ members' staff 華師正式會員/ 附屬會員/ 正式會員之僱員，每位 HK\$150  HK\$250 for non-member 非會員，每位 HK\$250
<b>Enrolment:</b> 報名:	Online application is on a first-come, first-served basis. Please visit <a href="http://www.scaacpa.org.hk">www.scaacpa.org.hk</a> >> Event >> Seminar/Training >> Course Code 4016 to enroll and settle the payment via PayPal, Credit Card or **Cheque.  <b>SCAA Full Members:</b> <b>Can enjoy priority privilege. Enrolment is now opened for full members.</b> <b>SCAA Affiliates, Members' staff &amp; Non-members:</b> <b>Enrolment starts at 2pm on 28 Oct 2016</b>  **No seat can be reserved through online or telephone. Enrolment will be processed until receipt of cheque payment. Please be reminded to complete the online form and send together the cheque to the Secretariat.  研討會以先到先得形式於網上報名，請到 <a href="http://www.scaacpa.org.hk">www.scaacpa.org.hk</a> >> 活動 >> 培訓課程及研討會 >> 課程編號 4016 報名並以 PayPal、信用卡或**支票付款。  <b>華師正式會員：可享優先報名，現正接受報名</b> <b>華師附屬會員、華師會員之員工及非會員：10月28日下午2:00開始報名</b>
<b>Enquiry:</b> 查詢:	**本會不設網上及電話留位，報名以收妥支票為準。請完成網上表格連同支票寄回本會秘書處。 SCAA Secretariat 華師秘書處 Ms Christine Yuen 袁小姐 Tel 電話: 2869 6003 Email 電郵: <a href="mailto:info@scaacpa.org.hk">info@scaacpa.org.hk</a>



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**Speaker's  
Bio:  
講者簡介:**

**Charles Chan**

*Director, Tax services  
PwC Hong Kong*

Charles Chan is a director in the Corporate Tax group of PwC Hong Kong. He has over 13 years experiences in providing tax consulting services to local, regional, multi-national and listed companies. Charles also has experience working as an Assistant Assessor in the Profits Tax Section of the Hong Kong Inland Revenue Department (IRD).

Over the years, Charles has been assisting many clients to handle different types of tax disputes with the IRD. Charles also has extensive experience in providing international tax consultation to his clients as well as involvement in tax planning and tax structuring work for companies with cross-border transactions. He has involved in many business advisory projects including merger and acquisitions and the set up of efficient corporate holding and operational structure for his clients.

Charles holds a Bachelor of Business Administration degree (major in Accounting and Finance) from the University of Hong Kong. Besides, he is a member of the Association of Chartered Certified Accountants.

**Ricky Chow**

*Senior Manager, Tax services  
PwC Hong Kong*

Ricky is a senior manager in the Corporate Tax group of PwC Hong Kong. He has extensive experience in providing Hong Kong and international tax consulting services and assisting companies with cross-border transactions on tax planning and tax structuring. He is also involved in many business advisory projects including the set up of tax efficient corporate holding and operational structure.

Ricky holds his Bachelor of Business Administration degree in Professional Accountancy from the Chinese University of Hong Kong. Besides, he is a member of the Hong Kong Institute of Certified Public Accountants.