



How Tax Audit and Investigation Cases can be resolved by TP

24 OCT 2018

Mr. Philip Hung
Ms. Wengee Poon
PwC Hong Kong

How tax audit and investigation cases can be resolved by TP

(Course Code 課程編號: 1918)

Highlights: 課程重點:

Highlights of the workshop include:

- Recent development of tax controversy and dispute resolution in Hong Kong
- How to use transfer pricing (“TP”) to resolve tax controversy cases
- Introduction on TP and the new transfer pricing legislation
- Real life case studies

With the formally introduction of the TP regulatory regime into Hong Kong tax legislation, the Inland Revenue Department (“IRD”) is following the global trend and is taking a more aggressive attitude on TP issues in cross-border intercompany transactions. As such, it can be expected that the key tax controversy area will be in TP in the near future. Growing number of tax disputes related to TP and increasing difficulties in handling such cases is foreseeable. Nevertheless, as the IRD is accumulating more knowledge and experience on TP, it becomes possible for taxpayers to use TP methodology to resolve the existing tax audit cases in a more effective way.

In view of this, PwC Tax Controversy and TP Services experts will provide the insights on the highlights of the new TP legislation and its influence, and the latest development of tax controversy and dispute resolution in Hong Kong. The speakers will also share real life cases with a view to demonstrate the tactics in dealing with tax disputes from a TP perspective.

Speaker (s): 講者:

Mr. Philip Hung, Director, Tax Controversy Services, PwC Hong Kong
Ms. Wengee Poon, Director, Transfer Pricing, PwC Hong Kong

Chairman: 主持:

Ms. Elizabeth Law 羅君美女士
Chairman of SCAA Taxation Committee 香港華人會計師公會 稅務委員會 主席

Date: 日期:

24 October 2018 (Wednesday)
2018年10月24日 (星期三)

Time: 時間:

6:30pm – 8:30pm
晚上 6:30 - 8:30

Venue: 場地:

1/F, Hall, Duke of Windsor Social Service Building (15
Hennessy Road, Wan Chai, Hong Kong)
溫莎公爵社會服務大廈 1樓禮堂 (香港灣仔軒尼詩道 15號)

請即
報名



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)
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**Language:**

語言:

Cantonese (with presentation slides in English)

廣東話 (英文簡報)

CPD hours:

CPD 時數:

2 hrs

2 小時

Fee:

費用:

HK\$200 for SCAA member/affiliate/member's staff

華師正式會員/ 附屬會員/ 正式會員之僱員，每位 HK\$200

Enrolment:

報名:

	Enrollment Date 報名日期
Member 正式會員	3 Oct 2018
Affiliate & Members' Staff 附屬會員及會員之僱員	2:00pm on 4 Oct 2018

Online application is on a first-come, first-served basis. Please click [HERE](#) to enroll and settle the payment via PayPal, Credit Card or **Cheque.

**No seat can be reserved through telephone. Enrolment will be processed upon receipt of payment. Please be reminded to complete the online form and send together with your cheque to the Secretariat.

研討會以先到先得形式於網上報名，請[按此](#)報名並以 PayPal、信用卡或**支票付款。

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Remarks:

備註:

Bad weather arrangement

This event may be cancelled or re-scheduled when typhoon no.8 or black rainstorm warning is hoisted. Please refer to our website www.scaacpa.org.hk for the arrangement.

惡劣天氣安排

八號風球或黑色暴雨警告信號生效時，課程將會延期舉行或取消。詳情請留意華師網站 www.scaacpa.org.hk 公佈。

Enquiry:

查詢:

SCAA Secretariat 華師秘書處

Ms Christine Yuen 袁小姐

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同心展關懷

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Founded in 1913

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Speakers' Bio:
講者簡介:

Mr. Philip Hung

*Director, Tax Controversy Services
PwC Hong Kong*

Philip is a director of Hong Kong Tax Controversy Services at PwC Hong Kong. He has over thirty years' experience in Hong Kong taxation with six years in IRD. He is a well-known expert in the tax field and investigation specialty. After he left the IRD, Philip concentrated on assisting clients in handling tax investigation and field audit cases. He is the first to set up a specialised team to handle the IRD's tax investigation and field audit cases for clients in the industry. His clients include fund managers, SME, listed companies and various MNC. He assisted in handling complicated cases such as worldwide onshore/offshore claim, disputes on contracting processing and import processing arrangements, offshore claim for Macao Offshore Company, IRD prosecution case and transfer pricing manipulation.

Ms. Wengee Poon

*Director, Transfer Pricing
PwC Hong Kong*

Wengee Poon is a director at PwC Hong Kong specialising in Transfer Pricing Services. With extensive experience in transfer pricing, Wengee has resolved transfer pricing matters for numerous multinational corporations. Her experience includes assisting clients in determining their transfer pricing structures, formulating transfer pricing policies, preparing transfer pricing documentation and performing post-implementation structure maintenance services. Wengee has served a broad spectrum of multinational corporations in various industries including garments, chemicals, telecommunications, electronics, and pharmaceuticals in the manufacturing, distribution and servicing aspects.

Wengee is also a speaker at public seminars and has contributed to professional publications. She holds a Bachelor degree in Economics and Statistics and a Master degree in Business Administration from the University of Rochester, New York, U.S.A.