

APACTAX CONFERENCE

Hosted by IFA - Hong Kong branch

Tax Webinars Program

Dates

Tuesday 27 April 2021 & Thursday 29 April 2021.

Time

Both webinars start at 1 pm till 3:15 pm Hong Kong time.

Format

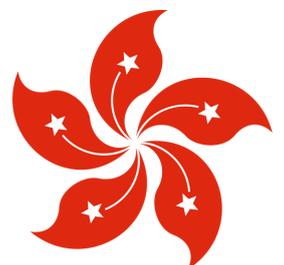
Both webinars comprise 2 sessions and each session will last no longer than 1 hour with a 15 min break in between.

Content

See reverse side of this flyer.

Interested to Attend?

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Tax Webinars Content

27 April 2021 - 1pm to 3:15pm HK time

- **Other Types of Competition (Besides Tax Competition) & Potential Benefits.**

Instead of tax incentives or tax subsidies, countries may also offer foreign multinational enterprises (MNE's) non-tax incentives or non-tax subsidies in order to attract investments. As a result of various OECD-projects, thereby introducing and/or proposing CbC-Reporting, CFC-Rules, Spontaneous Exchange of Tax Rulings and a Global Minimum Tax, these non-tax incentives may be preferred by the MNE's above a country's 'regular' tax incentive.

What types of non-tax competition packages are offered in the Asia Pacific Region and can these incentives be justified on policy grounds?

- **Certificates of Tax Residence: Common Practices and Issues in the Asia Pacific Region.**

Tax authorities are under no obligation to issue tax residence certificates upon request. As a result, requesting any tax residence certificates has become more and more challenging since most tax jurisdictions would only want to issue such certificate when this would be in 'alignment' with being a good tax treaty partner.

Panel members will discuss common practices and issues in their respective jurisdictions and by means of case examples discuss how some of the typical hurdles can be overcome.

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- **Indirect Transfer Taxes in M&A deals: A Dilemma?**

Indirect Transfer Taxes Issues are to be found in many jurisdictions including Mainland China and India. It includes underlying real estate and many companies are ignorant about this when they carry out a M&A deal, including internal group re-organisations.

What are the latest developments of these Indirect Transfer Taxes within the Asia Pacific Region? And does the recently issued 'Toolkit' from the OECD regarding Offshore Indirect Transfers have any influence on these developments?

- **Future Types of Information Exchanges & Tax Co-operation: What Lies Beyond the Horizon?**

Both the EU and the OECD recently introduced a new set of rules for automatic exchange of information on income earned by sellers on sharing and gig economy platforms. The EU proposal was launched on 15th of July 2020, known as 'DAC7', whereas the OECD proposal was launched a couple weeks earlier, on 3rd of July 2020, under the name 'Model Rules for Reporting by Platform Operators with respect to Sellers in the Sharing and Gig Economy ('Model Rules')'.

In addition to these proposals, what lies further ahead in terms of exchange of information and tax-co-operation within the Asia Pacific Region? Will there be any impact from the Belt and Road Initiative Tax Administration Cooperation Mechanism ('BRITACOM')?