

**Tax & Transparency:
what lies ahead for the tax department?**

**TEI TAX
SUMMIT 2018**

04 DECEMBER 2018 | HONG KONG
06 DECEMBER 2018 | SINGAPORE



Agenda

Tuesday, 04 Dec 2018, Hong Kong

Time	Topic	Speakers
08:30 am – 09:00 am	Registration (30 mins)	
09:00 am - 09:15 am	Welcome and introduction (15 mins)	Steven Sieker, Hong Kong William Thomson, WarnerMedia
09:15 am – 10:15 am	<p>The exchange of Country-by-Country Reports – how increased transparency may affect the sustainability of your transfer pricing model and your audit risk management strategy (60 mins)</p> <p>Over 1,800 bilateral exchange relationships have been activated between tax jurisdictions committed to exchanging CbC reports, reflecting the great interest of tax authorities in obtaining the data contained in the templates to facilitate tax risk assessments and bolster audit procedures to defend against (and to pre-empt) perceived base eroding or profit shifting activity by taxpayers. The first automatic exchanges of CbC reports have already taken place in June 2018, and will increase between jurisdictions in Asia in the following years. The impact to MNE's will therefore be significant and it is imperative to prepare for the increased scrutiny the information will provide.</p> <p>This practical panel will focus on how the exchange of CbC reports may affect the likelihood of audits, the target of audits, and how the conduct of audits may occur, given the additional information available. We will also address how MNE's should prepare and discuss practical strategies to manage any risks, to the extent possible, and to best defend your position if an audit occurs.</p>	<p>Moderator: Michael Nixon, Singapore</p> <p>Panelists: Amy Ling, China Carrie Lui, Hong Kong Ken Okawara, Japan Timothy Chuk, Trinseo</p>
10:15 am – 11:15 am	<p>OECD mandatory disclosure rules and DAC6: Mandatory disclosure tax reporting (60 mins)</p> <p>Under OECD proposals, intermediaries including banks, accounting firms, law firms, corporate service providers and others will be obliged to make disclosures to tax authorities if certain requirements are met. Where the intermediary is not required to make a filing it is proposed that the taxpayer will need to file instead. These rules have been implemented in the EU and are under consideration by other OECD and non-OECD members. What implications will such reporting have for taxpayers in Asia? What is the current status of these proposals in APAC? Which governments are implementing or considering implementing these rules?</p> <p>This panel will focus on what rules are in the pipeline and what consequences they will have for Asian based taxpayers.</p>	<p>Moderator: Michael Nixon, Singapore</p> <p>Panelists: Noam Noked, Hong Kong Tom Roth, UK Kari Pahlman, Techtronic Industries</p>
11:15 am -11:30 am	Coffee break (15 mins)	

Time	Topic	Speakers
11:30 am – 12:30 pm	<p>The MLI: What does the MLI do? (60 mins)</p> <p>This session will provide an overview of the MLI and its implications for Asia. What jurisdictions have signed the MLI? What provisions have been adopted or reserved? What will those provisions mean and how have we seen them adopted in other contexts? How does this change the tax treaty playing field for taxpayers? This session will be an overview of the key changes in the MLI and what it may mean for taxpayers in the region.</p>	<p>Carrie Lui, Hong Kong Edwin Whatley, Japan Tom Roth, UK</p>
12:30 pm – 01:30 pm	<p>Lunch (60 mins)</p>	
01:30 pm – 02:30 pm	<p>AEOI/CRS/FATCA/Beneficial Ownership registers – is anything still confidential? (60 mins)</p> <p>This session will cover the latest in the field of developments in relation to transparency from the MCAA to bilateral agreements on exchange of information as well as developments in relation to disclosure of beneficial ownership. What is being reported and to whom? What can taxpayers do, if anything, to find out what is being disclosed or how to prevent unauthorized disclosure?</p>	<p>Moderator: Steven Sieker, Hong Kong</p> <p>Panelists: Noam Noked, Hong Kong Richard Weisman, Hong Kong Istee Cheah, Malaysia</p>
02:30 pm – 03:30 pm	<p>Taxation of the digital economy: extending the scope of cross border taxation (60 mins)</p> <p>This session will cover the various ways in which governments in the region are attempting to tax and collect direct and indirect sales in the cross-border context with or without a permanent establishment. It will look not only at how these developments impact companies involved in electronic commerce, but how these expanded rules may impact traditional businesses.</p>	<p>Moderator: Allen Tan, Singapore</p> <p>Panelists: Dixon Hearder, Australia Nancy Lai, China Carrie Lui, Hong Kong Edwin Whatley, Japan Yvonne Beh, Malaysia Tom Roth, UK Karen Koh, Pernod Ricard</p>
03:30 pm – 03:45 pm	<p>Coffee break (15 mins)</p>	
03:45 pm – 05:00 pm	<p>Taxation disputes: the latest and the greatest (75 mins)</p> <p>The final session will cover the latest issues impacting taxpayers in jurisdictions across the region and what trends are emerging in tax disputes as well as prominent cases from across the region.</p>	<p>Moderator: Ponti Partogi, Indonesia</p> <p>Panelists: Dixon Hearder, Australia Amy Ling, China Steven Sieker, Hong Kong Kellie Yap, Malaysia Allen Tan, Singapore Teena Ingram, PMI</p>
05:00 pm	<p>Closing remarks (5 mins)</p>	