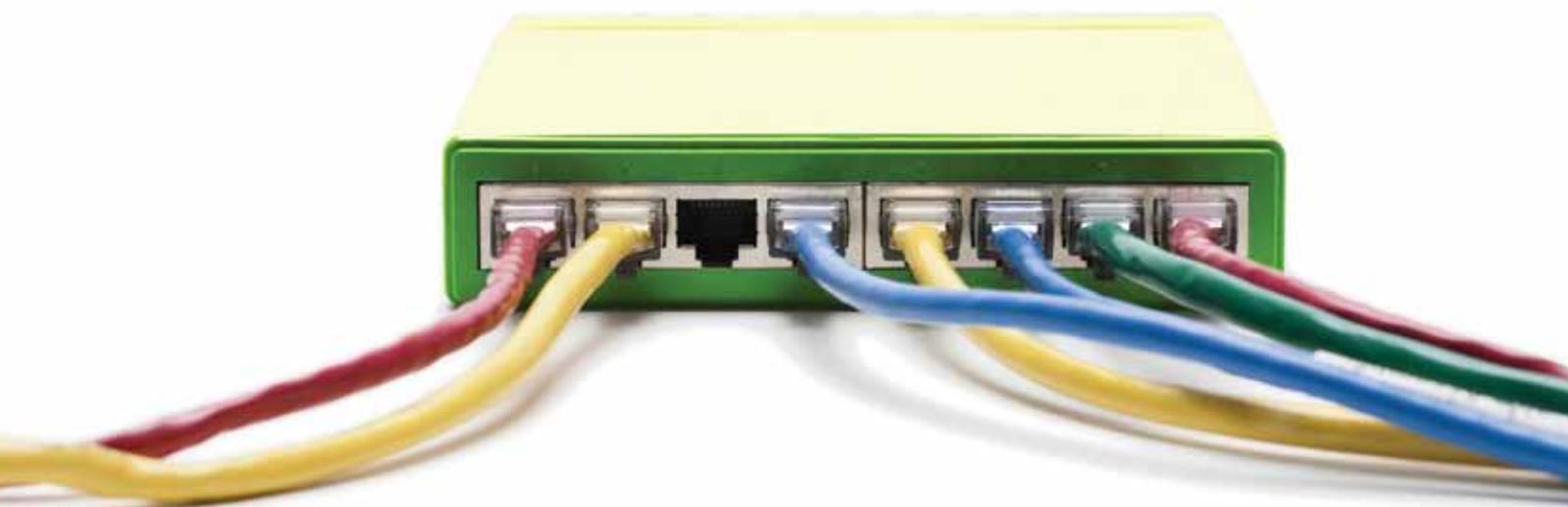


Dbriefs

Program Guide
April - June 2014

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Asia Pacific Tax

International Tax

Annual Review: Double Tax Treaty Update and OECD / UN Developments

> 29 April, 2:00 – 3:00 PM HKT (GMT +8)

Host: Steve Towers

Presenters: Leonard Khaw, Alyson Rodi, and Vicky Wang

We will review the important new double tax treaties in Asia Pacific, major case law and administrative developments concerning the interpretation of double tax treaties, and significant OECD / UN developments relating to double tax treaties and other international tax topics. We'll discuss:

- New double tax treaties signed or ratified by China, Japan, Korea, and other countries.
- Important cases on treaty interpretation, including the "permanent establishment" (PE) definition and anti-avoidance rules.
- Proposed amendments to the OECD Commentary.
- China's Bulletin 19 on employee secondments and PEs.
- The UN's initiative in regard to services income.
- Update on the OECD / G20 "base erosion and profit shifting" (BEPS) project.

Learn about the important developments in the last 12 months in regard to double tax treaties and OECD / UN projects.

Base Erosion and Profit Shifting (BEPS): What's Happened So Far? And What's Next?

> 27 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Steve Towers

Presenters: Anis Chakravarty, Leonard Khaw, Peter Madden, and David Watkins

The BEPS Project is the most important review of the world's international tax architecture in decades. Since its official launch by the OECD and G20 in July 2013, what have been the key developments, both globally and in Asia Pacific? We'll discuss:

- Work currently being undertaken by the OECD, including country-by-country reporting, transfer pricing documentation, the transfer pricing aspects of intangibles, the tax aspects of the digital economy, prevention of tax treaty abuse, and hybrid mismatch arrangements.
- Areas of potential "friction" amongst OECD / G20 countries.
- Updated "BEPS scorecard" for Asia Pacific countries: current legislative position, perspectives of governments and the public, and unilateral BEPS actions.
- The (expected) way forward.

Find out the current position on this very important international tax initiative.

Business Model Transformation in Asia Pacific: Lessons Learned

> 10 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Tom Ewigleben

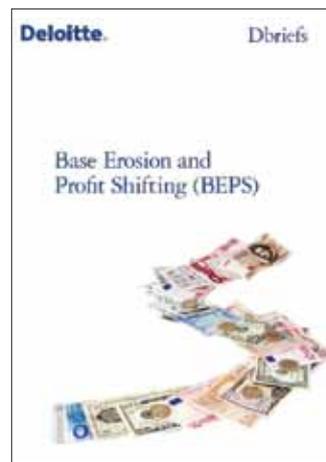
Presenters: Korneeka Koonachoak, Nazly Siregar, and Paul Zanker

Pioneering companies in Business Model Transformation have transformed their operating models, resulting in improved financial performance through, for example, lower effective tax rates (ETR), better operational efficiency, and better leverage on economies of scale. What exactly did they do and what could have been done differently? We'll discuss:

- What caused them to rethink their operating models – tax, operations, or both?
- Critical decisions made during design and implementation.
- Tax and operational benefits realized.
- Lessons learned from recent case studies.

Understand the experiences and lessons learned from these pioneering companies in the region.

BEPS Central



Visit BEPS Central at www.deloitte.com/ap/dbriefs/bepscentral, your one-stop shop for information on the BEPS Project. Here you can find all the official documents on the BEPS Project, as well as related Deloitte comments. You can also find information on Dbriefs Webcasts and Bytes on BEPS.



Asia Pacific Tax

India Spotlight

Deepening Links: Transfer Pricing and Indirect Tax in India

> 8 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Samir Gandhi

Presenters: Manisha Gupta and M.S. Mani

The debate on the linkages between transfer pricing (TP) and indirect taxes (IDT) is not new, though several recent developments in India have signified deeper ties are being formed between the two. How should you accommodate the TP and IDT issues on the same platform, in order to avoid adopting a silo approach to the growing complexities in these taxes? We'll discuss:

- Concept of related party in terms of transfer pricing regulations and indirect tax laws.
- Expanding TP legislation, including coverage of Specific Domestic Transactions.
- New perspectives on Customs Valuation for related party transactions based on two recent Customs decisions.
- The link between TP and service taxes, in light of the recent changes in the service tax legislation including the provision for a mechanism to compare the cost of providing services.
- Importance of documentation and reporting requirements suitable for TP and IDT.

Gain new insights on the deepening interplay between transfer pricing and indirect taxes.

E-commerce Transactions in India: The Final Frontier

> 12 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Prashant Deshpande

Presenters: Rajesh Gandhi and Rohinton Sidhwa

Electronic commerce in India is poised to grow significantly, as traditional infrastructure is outpaced by the feverish growth of India's cities. As the consumption based tax systems in India struggle to keep pace with these technological developments, what can e-commerce companies do to meet the challenges? We'll discuss:

- Current state of the market, projections for growth, and policies concerning opening up the market to foreign investors.
- Indian judicial precedent on various models such as cloud services, server space, and webserver as a PE.
- Impact, in India, of the OECD discussion paper on "Tax Challenges of the Digital Economy" released for public comment in March 2014.
- Impact of Indian indirect taxes on e-commerce transactions related to sale of goods such as e-tailing and electronically supplied services such as digitized content.

Gain insights from practical experiences and case studies on e-commerce transactions in India.

International Assignments

Waiting for Lightning to Strike: How do Employers Evaluate Risk in Tax Compliance?

> 29 May, 2:00 – 3:00 PM HKT (GMT +8)

Host: Russell Bird

Presenters: Tony Jasper, Jill Lim, and Paul Tyler

These days it seems that the question is not if an audit will strike but when. Tax authorities are scrutinizing information gathered to ensure individual and employer tax returns are aligned with current tax laws. Where are the particular areas of risk for employers in the Asia Pacific region, and how can we evaluate risk and take action? We'll discuss:

- Trends in audit activity and information gathering across the region.
- Techniques that employers can use to evaluate the tax risk in their compliance process.
- Specific areas of risk, such as business travelers, that employers should focus on and what they should do when "lightning strikes".

Learn how employers are addressing specific areas of risk in tax compliance across the region.

Learn more



BMO is the methodology that is used to optimize a multinational company's global or regional business model by aligning the relevant assets, functions and risks, and focusing on the key value chain. Visit www.deloitte.com/in or reach out to your Deloitte contact to learn more.

Asia Pacific Tax

Industries – Financial Services

The Countdown for FATCA Compliance: Where are We Now and What to Do after the Deadline Has Passed?

> 5 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Jim Calvin

Presenters: Marie Gervacio and Alison Noble

Foreign Account Tax Compliance Act (FATCA) will go live on 1 July 2014. Many financial institutions, however, will be unprepared or under-prepared due to late starts or failure by governments to have timely signed intergovernmental agreements (IGA) with the U.S. What can financial institutions do to prepare for FATCA? We'll discuss:

- Uncertainties such as whether and which model of IGA will be signed in jurisdictions relevant to a financial institution in the compliance landscape within the time remaining.
- How to deal with non-compliant counterparties – when and how it becomes relevant.
- Reconciliation and upgrading processes from the U.S. regulations in order to meet IGA standards such as automated onboarding and reasonableness checks, and local compliance program requirements and enforcement under an IGA.

Learn how financial institutions can prepare themselves for FATCA, leading up to and beyond 1 July 2014.

Indirect Tax

VAT / GST on Cross-border Digital Services and Intangibles: What next for B2B and B2C Rules in Asia Pacific?

> 19 June, 4:00 – 5:00 PM HKT (GMT +8)

Host: Robert Tsang

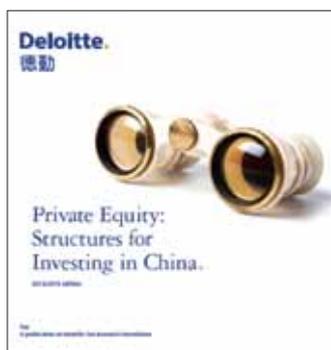
Presenters: Aili Nurk, Chikara Okada, and Chandran Ramasamy

A number of Asia Pacific countries, namely China, Japan, and Malaysia, are implementing new indirect tax rules over the next 18 months and all are focused on new ways of tackling taxation of cross-border services and intangibles. Concurrently with the BEPS project, the OECD is also taking steps on the indirect tax front to develop the next set of OECD VAT / GST International Guidelines focusing on the "challenges of taxing the digital economy". We'll discuss:

- The rules for indirect taxation of electronic or digital B2C supplies in step with BEPS recommendations.
- Soon to be finalized OECD rules on B2B supplies and where the B2C work is likely to be headed.
- How Asia Pacific tax authorities are approaching this, particularly in Japan with the increase in consumption tax rate and scope starting in April this year, in China as part of the ongoing VAT Reform Program, and in Malaysia as part of the GST rollout in April 2015.

Explore more about how the VAT / GST rules are shaping and developing across the region.

Stay ahead



Private Equity: Structures for investing in China (2014/2015 edition)

This latest thought piece offers key insights to private equity originators and investors on the tax implications of the various fund structures. Please visit http://www.deloitte.com/cn/private_equity. Reach out to Deloitte professionals to discuss future fund structuring needs.



Asia Pacific Tax

Transfer Pricing

Transfer Pricing Issues in the Context of Mergers and Acquisitions

> 26 June, 2:00 – 3:00 PM HKT (GMT +8)

Host: Shanto Ghosh

Presenters: Samir Gandhi, Tae Hyung Kim, and Danny Po

Multinational enterprises often rely on inorganic growth to expand their global footprint. As mergers and acquisitions (M&A) activity becomes prevalent, transfer pricing issues have come to play an important role in the pre- and post-acquisition process. We'll discuss:

- Key characteristics of M&A activity across the globe with specific emphasis on Asia Pacific.
- Transfer pricing issues in the due diligence phase of an M&A deal, including possible risk from lack of documentation or support for pre-existing transfer pricing policies, and suitable reserves for uncertain tax positions.
- Post-acquisition transfer pricing issues such as aligning pre- and post-acquisition transfer pricing policies in the integrated group, and transfer pricing issues related to business restructuring in the post-acquisition phase.

Gain insights from an in-depth discussion on the importance of transfer pricing issues in the context of M&A.

Know more



Deloitte India recently conducted a survey to track the burning issues surrounding the indirect tax functions of trade and industry, deliberating upon the concerning issues impacting the indirect tax field. Visit www.deloitte.com/in or reach out to your Deloitte contact to learn more.



普通话网络讲座 Chinese Language Webcasts

税务

新海关审价办法：机遇与挑战并存

> 4月23日上午11时-下午12时 (香港/北京时间, GMT +8)

主持人：周翊

主讲人：张少玲及杨永毅

海关总署于2013年底公布了《中华人民共和国海关审定内销保税货物完税价格办法》(211号令)和新修改的《中华人民共和国海关审定进出口货物完税价格办法》(213号令)。在原海关审价办法148号文实施近8年后，中国海关对其做出了较大的调整。为了使企业更好地了解法规变化，应对法规变化可能带来的影响，此网络讲座将重点讨论211号令和213号令对进出口货物以及保税货物的价格审核所做出的调整及其影响。我们将讨论：

- 新颁布的两个海关审价办法的出台背景以及与原审价办法相比的主要变化。
- 新审价办法可能给企业带来的影响分析。
- 如何更好有效应对海关审价。
- 案例分享。

请参与此网络讲座，了解更多新海关审价办法带来的影响。

Japanese Language Webcasts

戦略的な経営幹部報酬制度

～設計および税務上の留意点を踏まえて～

> 5月21日 12:00 - 1:00 PM (日本時間、GMT+9)

司会進行：川井 久美子

講師：村中 靖、白澤 賢

日本企業のグローバル化に伴い、人材の多国籍化、海外勤務者の増加、外国人幹部役員の採用など、グローバルな視点での人材マネジメントの重要性が認識され始めています。国際競争が激化する環境下において、グローバル人材の育成や海外における高いスキルやノウハウを持った人材の重要性は増しており、日本本社は自社の海外進出状況に応じて、ビジネスを適切にサポートする戦略的な報酬制度の体系を整備することが必要になってきています。

今回は、最近のトレンドであるグローバル役員報酬や海外経営幹部報酬に係る報酬制度の動向、制度設計について、事例を踏まえて解説を行います。また、海外勤務者が株式報酬など長期インセンティブを付与された場合の税務上の留意点についても併せて解説します。

- 経営幹部報酬の見直しの必要性とその背景
- 海外勤務役員の場合の費用負担と税務上の留意点
- 株式報酬制度と海外勤務者の税務上の留意点 等

Gain insights



50カ国を超える国・地域のインセンティブプランに係る税務情報を網羅した無料オンラインデータベース(英語)。詳しくは、<http://www.tohmatsu.com/tax/gaequity>をご覧ください。

Our Presenters

Asia Pacific Tax

Australia

Peter Madden, Alison Noble, Alyson Rodi, Paul Tyler, David Watkins

China

Marie Gervacio, Tony Jasper, Leonard Khaw, Danny Po, Vicky Wang, Paul Zanker

India

Anis Chakravarty, Prashant Deshpande, Rajesh Gandhi, Samir Gandhi, Manisha Gupta, M.S. Mani, Rohinton Sidhwa

Indonesia

Nazly Siregar

Japan

Russell Bird, Chikara Okada

Korea

Tae Hyung Kim

Malaysia

Chandran Ramasamy

Singapore

Jim Calvin, Tom Ewigleben, Jill Lim, Steve Towers, Robert Tsang

Thailand

Korneeka Koonachoak

United Kingdom

Aili Nurk

United States

Shanto Ghosh

普通话网络讲座 Chinese Language Webcasts

税务

杨永毅 (Yong Yi Yang), 张少玲 (Janet Zhang), 周翊 (Yi Zhou)

Japanese Language Webcasts

川井 久美子 (Kumiko Kawai), 村中 靖 (Yasushi Muranaka), 白澤 賢 (Satoshi Shirasawa)



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