

Tax Link *by TIG*



The Institute's Taxation Interest Group (TIG) is a forum for CPAs to discuss matters of common interest in the field of Hong Kong and cross-border taxation and for professional development of CPAs in this area of expertise. *Tax Link* is a newsletter exclusive to TIG members covering local, cross-border and international tax matters.

Taxation Faculty

The Institute is planning to set up a taxation faculty to provide better support and be a centre of excellence for members and other professionals involved in taxation work. At that time, TIG will be subsumed into the faculty and the activities and services currently provided by TIG will be provided by the faculty. Watch for further details.

Publications

1. From the Hong Kong Institute of CPAs

- [Factoring taxation strategies into expansions and restructurings](#)
- [China's tax reform blueprint for the 12th five-year plan](#)

2. From IRD

- [DIPN31 \(Revised\)](#) and [DIPN 25 \(Revised\)](#)
- [Block extension scheme for lodgement of 2011-12 tax returns](#)
- Advance ruling case [no. 47](#) (relating to IRO s14(1), 15(1)(c), 15(2), 61 and 61A) and [no. 48](#) (relating to s14 and 16)
- Legco questions relating to:
 - [Special stamp duty, 29 Feb 2012](#)
 - [Home loan interest, 1 Feb 2012](#)
 - [Arrangement for avoidance of double taxation, 23 Nov 2011](#)
- [List of qualifying debt instruments as at 31 Dec 2011](#)
- [2012-13 budget - tax measures](#) (see also [Institute's budget proposals](#))
- The Companies Registry and the IRD jointly introduced an optional electronic one-stop notification service in respect of change of address (see details in [Q21](#), [Q21b](#) and [Q22a](#) of 'FAQ – One-stop Company and Business Registration and One-stop Notification of Change of Company Particulars')

3. Advance pricing arrangement

- [DIPN48](#) from IRD
- [Hong Kong introduces an advance pricing agreement programme](#) by KPMG
- [Advance pricing agreements: current developments across Asia Pacific](#) (webcast) by Deloitte

4. Hong Kong/ cross-border matters

- [Share-based payments – The IRD announces new stance on allowing tax deductions for group-recharge situations](#) by Ernst & Young (see also [IRD's announcement](#) and [amendment to Q9 of "FAQ for share-based payment transactions"](#))
- [Tax deduction for the acquisition costs of specified intellectual property rights is finally in place](#) by PwC (see also [Inland Revenue \(Amendment\) \(No. 3\) Ordinance 2011](#), and Institute's [first](#) and [second](#) submissions)
- [Taxpayer can now make an advance ruling application on behalf of a class of persons](#) by Ernst & Young
- [Be prepared - 2011 year-end China tax checklist](#) by KPMG
- [Official launch of the RMB Qualified Foreign Institutional Investors \(RQFIIs\) pilot programme](#) by KPMG
- [Anti-avoidance rules in China: lessons from reported cases to date](#) by Deloitte (webcast)

5. Indirect tax matters

- [More guidance on VAT reform pilot program in Shanghai](#) by Deloitte
- [China has revised the foreign investment industrial guidance catalogue](#) by Ernst & Young

6. Double taxation matters

- IRD's announcements on:
 - Hong Kong signs tax treaty with [Jersey](#) and [Malta](#)
 - Effective dates of DTAs concluded between Hong Kong and the following countries:

Spain	-	13 Apr 2012
Czech Republic	-	24 Jan 2012
French Republic	-	1 Dec 2011
New Zealand	-	9 Nov 2011
- [Taxation of business profits of non-resident companies in Hong Kong in a treaty context](#) by PwC
- [The latest development in interpreting the concept of permanent establishment in a treaty context](#) by PwC

7. Regional/ international tax matters

- [Asia Pacific tax](#) by Grant Thornton