



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.

Events

Upcoming TIG event – 16 September

Mr David Smith, senior adviser at PwC's tax services, a former editor of *Hong Kong Taxation: Law and Practice*, and an experienced commentator on tax, will talk about the principles underlying double tax agreements and issues that arise in their interaction with the IRO. [Click](#) for details and an enrolment form.

New service for TIG

The TIG online discussion forum is now available with a re-designed interface. [Click](#) to login and exchange views on tax related issues with your fellow TIG members.

Handouts of annual tax update

The annual tax update was held on 24 July, covering legislation, court and board of review cases, DIPNs and mainland tax. The [order form](#) for the handouts can be downloaded at the Institute's website.

Publications

1. Special focus – transfer pricing

- Presentation slides for the transfer pricing seminar organised by the IRD and the Mainland's State Administration of Taxation (SAT)
 - [內地反避稅工作情況](#)
 - [內地反避稅立法介紹](#)
 - [香港特別行政區轉讓定價的發展](#)
 - [《稅務條例釋義及執行指引》第 45 號及第 46 號](#)
- [2008 and 2009 transfer pricing documentation inspections by PRC SAT](#) by Deloitte
- [The SAT's national anti-avoidance training focuses on the automotive industry](#) by Ernst & Young
- [Asia-Pacific transfer pricing guide](#) by KPMG
- [Transfer pricing controversy \(webcast\)](#) by PwC

2. From the Hong Kong Institute of CPAs

- [Hong Kong-Japan tax treaty offers investment benefits](#)

3. From IRD

- [DIPN47](#), exchange of information under comprehensive double taxation agreements, which took on board suggestions made by the Institute
- Revised DIPNs [27](#), profits tax stock borrowing and lending, and [40](#), profits tax prepaid or deferred revenue expenses
- [Advance ruling case no. 43](#), related to IRO s14
- [Hong Kong, Liechtenstein sign tax pact](#)
- [Property tax - obligations of property owners](#)
- [FAQ on tax deduction for environment-friendly vehicles](#)
- [Stock borrowing relief - filing of return of stock borrowing transactions](#)

4. On Hong Kong/ cross-border matters

- [CIR v C G Lighting Limited - apportionment of profits not available under import processing arrangement](#) by Ernst & Young
- [Judicial review - objections to be determined within a reasonable time](#) by KPMG
- [Hong Kong: Moving in full throttle to expand tax treaty network - individual tax perspective](#) by PwC
- [China taxes indirect transfer of PRC company by nonresident](#) by Deloitte
- New rules on the calculation of corporate income tax for non-resident enterprises and new regulations governing representative offices in China (click on [Tax talk issue 2, 2010](#)) by Grant Thornton

5. On international tax matters

- [Tax: who pays what?](#) by OECD

TIG Needs You!

Do you know of a good tax article that is worth sharing or have suggestions for this newsletter? Please email tig@hkicpa.org.hk.