IIDS8 (Apr 2017)

RGC Ref. No.: UGC/IIDS14/B01/16 (please insert ref. above)

### RESEARCH GRANTS COUNCIL COMPETITIVE RESEARCH FUNDING SCHEMES FOR THE LOCAL SELF-FINANCING DEGREE SECTOR

# INTER-INSTITUTIONAL DEVELOPMENT SCHEME (IIDS)

### **Completion Report**

(for completed projects only)

Submission Deadlines:	1.	The unspent balance, if applicable, and auditor's report: within <b>six</b> months of the approved project completion date.	
	2.	<i>Completion report: within</i> <u>12</u> <i>months of the approved project completion date.</i>	

# Part A: The Project and Investigator(s)

# 1. Project Title

Symposium of Taxation: The Era of BEPS

# 2. Investigator(s) And Academic Department(s) / Unit(s) Involved

Research Team	Name / Post	Unit / Department / Institution
Principal Investigator	Ms. LEE Hau Yee Senior Lecturer	Department of Accountancy, The Hang Seng University of Hong Kong
Co-Principal Investigator(s)	Dr. KWOK Yuk Sim Betty Assistant Professor (Accounting Practice)	Department of Accountancy, The Hang Seng University of Hong Kong
Co-Investigator(s)	Dr. WONG Yeuk Ha Brossa Associate Professor (till 15 Aug 2017) College Registrar (effective from 16 Aug 2017)	Department of Accountancy, Registry, The Hang Seng University of Hong Kong
Co-Investigator(s)	Dr. SHI Shanshan Senior Lecturer (till 31 July 2017) Programme Director Master of Accountancy & Postgraduate Diploma in Accountancy (effective from 1 Aug 2017)	Department of Accountancy, Hang Seng Management College Department of Accountancy, Lingnan University

Co-Investigator(s)	Mr. CHENG Ka Chun Chris Lecturer I	Department of Accountancy, The Hang Seng University of Hong Kong
Co-Investigator(s)	Dr. CHOW Yi Hang Eden Senior Lecturer	Department of Accountancy, The Hang Seng University of Hong Kong

# 3. Project Duration

	Original	Revised	Date of RGC / Institution Approval (must be quoted)
Project Start Date	1 January 2017	No revision made	
Project Completion Date	31 December 2017	No revision made	
Duration (in month)	12 months	No revision made	
Deadline for Submission of Completion Report	31 December 2018	No revision made	

# Part B: The Final Report

### 5. Collaboration With Other Self-Financing Degree-Awarding Institutions

Collaborating Self-Financing Institution	% of Participation	Distinctive Element(s) that the Institution is Responsible for the Project
Nil	Nil	Nil

### 6. Project Objectives

6.1 Objectives as per original application

The objectives of the symposium are:

- 1. To offer a timely platform to share information and discuss on BEPS development;
- 2. To arouse the alertness of the relevant stakeholders, including business players, tax practitioners, academics, government officials, and the general public;
- 3. To provide a venue drawing talents from tax practitioners, academics as well as government officials to present on the same topic;
- 4. To allow tax practitioners and academics to exchange views on practical and theoretical perspectives; and
- 5. To facilitate cross-disciplinary networking amongst practitioners, academics and officials.

### 6.2 Revised objectives

Same as above, no revision made

Date of approval from the RGC:	N/A
Reasons for the change:	N/A

### 6.3 Realisation of the objectives

(Maximum 1 page; please state how and to what extent the project objectives have been achieved; give reasons for under-achievements and outline attempts to overcome problems, if any)

**<u>Objective#1</u>**: To offer a timely platform to share information and discuss on BEPS development.

**<u>Realization</u>**: The two-day symposium was held on 3 and 4 August 2017. We believe it is a timely platform to share information and discuss on BEPS. In September 2015, Hong Kong government has indicated supports to China committing to adopt the OECD's new global reporting standard on Automatic Exchange of Information in tax matters. Also, given that all the BEPS actions have been endorsed in 2015 and Hong Kong is not immune from the impacts, this is the right timing to arouse the research interests in this area for academics and to offer a platform for both practitioners and academics to exchange views and information.

**<u>Objective#2</u>**: To arouse the alertness of the relevant stakeholders, including business players, tax practitioners, academics, government officials, and the general public.

**<u>Realization</u>**: The event was a great success which attracted over 200 guests and participants, who are senior executives, business players, tax professionals and practitioners, academics and government officials. They came from Hong Kong, the Mainland China, and other parts of the world to speak on the theme of BEPS.

**<u>Objective#3</u>**: To provide a venue drawing talents from tax practitioners, academics as well as government officials to present on the same topic.

**<u>Realization</u>**: Total 11 speakers were invited and 11 sessions were held on various topics on BEPS, surrounding in 4 main areas: (i) digital economy, (ii) common reporting standard, (iii) harmful tax practices and (iv) transfer pricing. There were at least 2 sessions on each topic, one was delivered by government officials or academic researchers, while the other one was delivered by tax practitioners. They shared the insight of the same topics from different prospective.

**<u>Objective#4:</u>** To allow tax practitioners and academics to exchange views on practical and theoretical perspectives.

**<u>Realization</u>**: Scholars, practitioners and government officials were invited as speakers on the four timely BEPS topics. The conference was able to bridge the gaps between practical and theoretical perspectives and to provide a more comprehensive understanding of the challenges and opportunities faced under the current international tax environment.

**<u>Objective#5:</u>** To facilitate cross-disciplinary networking amongst practitioners, academics and officials.

**<u>Realization</u>**: The Symposium brought together the academia experts, professional practitioners and government officials from Hong Kong, the Mainland China, and other parts of the world to share their insights and facilitate cross-disciplinary networking amongst practitioners, academics and government officials.

### 6.4 Summary of objectives addressed to date

ο	bjectives	Addressed (please tick)	<b>Percentage</b> <b>Achieved</b> (please estimate)
1.	To offer a timely platform to share information and discuss on BEPS development.	1	100%
2.	To arouse the alertness of the relevant stakeholders, including business players, tax practitioners, academics, government officials, and the general public.	1	100%
3.	To provide a venue drawing talents from tax practitioners, academics as well as government officials to present on the same topic.	1	100%
4.	To allow tax practitioners and academics to exchange views on practical and theoretical perspectives.	1	100%
5.	To facilitate cross- disciplinary networking amongst practitioners, academics and officials.	1	100%

### 6.5 Project progress

Original Implementation Schedule		Revised Implementation Schedule (Date of RGC's Approval)	Updated Progress
January / February 2017	Search and identify potential speakers in the academic, government, and practitioner circles	No revision made	Completed
January / February 2017	Evaluate various options of promotion and make decisions, design of the promotional materials	No revision made	Completed
February / March 2017	Check availability and confirm topics of the presentation with the identified speakers, finalize on the conference dates	No revision made	Completed

April 2017	Arrange local transportations, book hotel accommodation, and fix flight itinerary for overseas guests	No revision made	Completed
April 2017	Distribute promotional materials and conduct publicity in various media outlets to a wide audience, send out invitations	No revision made	Completed
May 2017	Identify and arrange IT needs (e.g., audio/visual equipment, simultaneous interpretation), catering service for refreshment, and PR for the event	No revision made	Completed
June 2017	Re-confirm the speakers' availability and topics for possible adjustments, if any, and finalize the conference rundown, prepare souvenirs for the guests	No revision made	Completed
July 2017	Set up venue and other preparation work (e.g., venue registration, printing, and other administration support, etc.)	No revision made	Completed
two days in summer 2017	Actual conduct of the tax conference	No revision made	Completed
September / October 2017	Collect feedback from participants of the symposium, send thank you note, conduct audit, prepare and submit final report of the Symposium	No revision made	Completed

Title / Name (Surname in Capital Letters)	Post / Institution	Title / Topic of Presentation / Course	Previous Research Links with Hong Kong Institutions (Nature and Date (Month / Year))
Mr. WONG Kuen-fai, Richard, JP	Commissioner Inland Revenue Department Hong Kong SAR Government	Keynote Speech BEPS: Hong Kong's Response	Policymaker in HK
Ms. Caroline MALCOLM	Counsellor to the Director and Deputy Director Centre for Tax Policy and Administration OECD	Keynote Speech BEPS in 2017 – Where are we now?	Nil
Mr. Michael OLESNICKY	Special Advisor KPMG Tax Limited	What are the tax challenges posed by the digital economy, and how can they be resolved?	Tax practitioner in HK
Prof. Marie LAMENSCH	Research Professor European Economic Governance Institute for European Studies Vrije Universiteit Brussel (VUB)	BEPS Action 1: Addressing the Tax Challenges of the Digital Economy - Indirect Tax aspects	Nil
Prof. SHI Zhengwen	Professor of Tax Law Director of the Center for Fiscal and Tax Law Research China University of Political Science and Law	China and CRS: Opportunity, Challenge and Response	Nil
Mr. Roy PHAN	Senior Tax Manager Deloitte - Hong Kong	Common Reporting Standard and its implementation in Hong Kong	Tax practitioner in HK
Mr. Benjamin CHAN Senior Assessor Inland Revenue Department HKSAR Government		Countering Harmful Tax Practices: Recent Developments and Implications for Hong Kong	Policymaker in HK
Mr. Bart KOSTERS Senior Principal Research Associate Tax Services Department IBFD		Harmful Tax Practices – A New Dawn?	Nil
Mr. Jeremy CHOI Ms. Anita TSANG	Tax PartnerPwC - Hong KongAssociate DirectorPwC - Hong Kong	Harmful Tax Practices – Case Studies on Preferential Tax Regimes in Different Jurisdictions	Tax practitioners in HK
Mr. Martin RICHTER	Transfer Pricing Partner EY Greater China	Transfer Pricing under the Base Erosion and Profit Shifting (BEPS) Framework Convergence of China and Hong Kong Transfer Pricing Regulations with BEPS Framework	Tax practitioner in HK

6.7 Please provide details of the activities organized, including the theme / objectives of the activities, targeted participants, attendance, analysis of participants, e.g. country of origin, research background, etc., evaluation forms of the activities and a summary of the participants' evaluation. Photos of the activities are preferred.)

### The Symposium

A two-day symposium titled "Symposium of Taxation: The Era of BEPS" was held on 3 and 4 August 2017. It succeeded in bringing together business and tax practitioners, academics and government officials from Hong Kong, mainland China and other parts of the world, who exchanged ideas and thoughts on the theme of Base Erosion and Profits Shifting (BEPS).

Distinguished overseas and local scholars and tax experts delivered talks on timely four BEPS topics including digital economy, common reporting standard, harmful tax practices and transfer pricing. More than 200 guests and participants, comprising senior executives and tax professionals from public practices and industries, as well as faculty members from different universities and colleges attended the conference for timely updates on the BEPS development.

The symposium was inaugurated by Professor Simon Ho, President of the Hang Seng University of Hong Kong; while Ms Karmen Yeung, President of the Taxation Institute of Hong Kong, delivered an opening remark. Mr Wong Kuen Fai, JP, Commissioner of Inland Revenue, the Government of HKSAR and Ms Caroline Malcolm, Counsellor to the Director and Deputy Director, Centre for Tax Policy and Administration of the Organisation for Economic Co-operation and Development (OECD) attended as keynote speakers to share their views and insights on the latest development of BEPS.

	Number
Total Guest Speakers	11
~ Academics / Researchers	4
~ Government officers	2
~ Tax practitioners	5
~ Overseas / Mainland China	4
~ Hong Kong	7

### **Guest Speakers**

### **Participants**

	Number	% of Total
Total registered participants	149	100%
~ from CPA firms	73	49%
~ from Corporate / Commercial	21	14%
~ from Academics	20	13%
~ from Consultancy / Law firms	10	7%
~ from Financial Institutions	3	2%
~ Others or not indicated	22	15%

# **Participants' Feedback and Evaluation**

### Feedback forms collected: 57 responses

No. of Respondents	Excellent [5]	Good [4]	Average [3]	Poor [2]	Very Poor [1]	N/A	Average Score
Enrollment and Registration	35	20	2	0	0	0	4.58
Presentation Topics and Contents	24	26	7	0	0	0	4.30
Venue and Facilities	29	24	1	3	0	0	4.39
Catering and Refreshments	31	18	7	1	0	0	4.39
Shuttle Bus Service	15	26	6	3	0	7	4.06
Overall	28	26	3	0	0	0	4.44

How would you rate the following aspects?

Which topic(s) is/are of the most interests to you? (Can choose more than one)

Topics	No. of	% of Total	
	Respondents	Respondents	
BEPS	15	26.32%	
Transfer Pricing	20	35.09%	
Harmful Tax Practices	10	17.54%	
Common Reporting Standard	9	15.79%	
Digital Economy	6	10.53%	

Other comments and suggestions from respondents:

- shorten the length of symposium
- include local tax cases
- add Q&A session
- add a separate research paper session for academics
- provide printed handouts and presentation materials
- shuttle bus service to the conference venue

<u>Symposium Website</u> http://taxsym2017.hsmc.edu.hk/

# Symposium Brochure

(Please refer to Appendix 1)

# **Invitation Email to Participants**

meezane	
SMC - Symposium of Taxation: The Era of BEPS <taxsym2017@hsmc.edu.hk> , To Alt Staff <tsmc_allstaff@hsmc.edu.hk></tsmc_allstaff@hsmc.edu.hk></taxsym2017@hsmc.edu.hk>	5 June 2017 at 17
Dear Colleagues.	
Symposium of Taxation: The Era of BEPS	
3-4 August 2017	
You are cordially invited to attend the capitoned Symposium which is scheduled to be held on 3-4 August 2017 at Hang Seng Managemen School of Business, HSMC and funded by the Research Grants Council (RGC) of the Hong Kong University Grants Committee (UGC). We supporting organisation of the event.	
Base Erosion and Profits Shifting (BEPS) refers to tax planning strategies that exploit gaps and mismatches in tax rules of different jurisdiction little or no economic activity, resulting in little or no overall corporate tax being paid.	is to artificially shift profits to low or no-tax regions where there is
Driven by the call from the G20 leaders, the Organisation for Economic Co-operation and Development (OECD) has commenced work since and mismatches in tax rules of different jurisdictions, to ensure that taxing rights between countries are fairly allocated. A comprehensive pac measures are not legally binding, they are expected to be implemented by all participating countries with an aim to achieving the global fairness.	ckage of 15 action plans is developed by OECD. Although these
This Symposium of Taxation provides a platform for knowledge exchange on tax development in BEPS and the OECD's 15 action plans. It is business players, tax practitioners, academics and government officials, in order to bridge the gaps between practical and theoretical perspet he world were invited to share thair insights and facilitate cross-disciplinary networking. We believe that participants from different disciplin formulate consistent and effective BEPS strategies and how to take proactive measures to implement the BEPS action plans.	ctives. Guests and speakers from Hong Kong and other parts of
Attendance is free-of-charge and registration is on a first-come-first-served basis. For registration, please kindly complete and submit the on-lin Successful registrants will receive our confirmation of seats before the event. For detailed information about the Symposium, please visit the Sy attached leaflet. For enquines, please feel free to contact us at taxsym2017@hsmc.edu.hk	
Looking forward to seeing you at the Symposium.	
Best regards,	
Organising Committee	
Symposium of Taxation: The Era of BEPS	
End,	
E-Leaftet (PDF)	
IHSMC] E-Leaflet - Symposium of Taxation.pdf	

# Invitation Email to Participants (through TIHK e-circular)



# **E-leaflet of the Symposium**



# Programme Rundown

# Programme Rundown 3 August 2017 (Thursday)

Time	Topics	Speakers
09:00	Registration, Morning Tea and Coffee	
09:15	Group Photos	<b>T</b>
09:20	Welcome Speech and Opening Remarks	Professor Simon Ho President Hang Seng Management College
09:30	Souvenir Presentation	+
09:35	Opening Remarks by Supporting Organisation TIHK	Ms. Karmen Yeung President The Taxation Institute of Hong Kong
09:45	Keynote Speech BEPS: Hong Kong's Response	Mr. Wong Kuen-fai, Richard, JP Commissioner Inland Revenue Department HKSAR Government
10:15	Keynote Speech BEPS in 2017 Where Are We Now?	Ms. Caroline Malcolm Counsellor to the Director and Deputy Director Centre for Tax Policy and Administration OECD
10:45	Coffee Break	
11:15	What Are the Tax Challenges Posted by Digital Economy, and How Can They Be Resolved?	Mr. Michael Olesnicky Special Advisor KPMG Tax Limited
12:00	BEP5 Action 1: Addressing the Tax Challenges of the Digital Economy - Indirect Tax Aspects	Professor Marie Lamensch Research Professor European Economic Governance Institute for European Studies Vrije Universiteit Brussel(VUB)
12:45	Lunch	÷
14:30	China and CRS: Opportunity, Challenge and Response	Professor Shi Zhengwen Professor of Tax Law Director of the Center for Fiscal and Tax Law Research China University of Political Science and Law
15:15	Coffee Break	
15:45	Common Reporting Standard and Its Implementation in Hong Kong	Mr. Roy Phan Senior Tax Manager Deloitte - Hong Kong
16:30	Close of the Day	

# 4 August 2017 (Friday)

Time	Topics	Speakers
Time	topics	Speakers
09:15	Registration, Morning Tea and Coffee	-
09:40	Group Photos and Souvenir Presentation	-
09:45	Countering Harmful Tax Practices: Recent Developments and Implications for Hong Kong	Mr. Benjamin Chan Senior Assessor Inland Revenue Department HKSAR Government
10:30	Harmful Tax Practices - A New Dawn?	Mr. Bart Kosters Senior Principal Research Associate Tax Services Department IBFD
11:15	Coffee Break	-
11:45	Harmful Tax Practices - Case Studies on Preferential Tax Regimes in Different Jurisdictions	Mr. Jeremy Choi Tax Partner PwC - Hong Rong Ms. Anita Tsang Associate Director PwC - Hong Kong
12:30	Lunch	<del></del>
14:00	Transfer Pricing under the Base Erosion and Profit Shifting (BEPS) Framework	Mr. Martin Richter Transfer Pricing Partner EY Greater China
14:45	Coffee Break	<u>م</u>
15:15	Convergence of China and Hong Kong Transfer Pricing Regulations with Base Erosion and Profit Shifting (BEPS) Framework	Mr. Martin Richter Transfer Pricing Partner EY Greater China
6:00	Close of Conference	*

### Post-event News Post on HSUHK's website

https://www.hsu.edu.hk/en/symposium-of-taxation-the-era-of-beps-2/



Kong and funded by the Research Grant Council of the Hong Kong University Grants Committee (grant number UGC/IIDS14/B01/16). It succeeded in bringing together business and tax practitioners, academics and government officials from Hong Kong, mainland China and other parts of the world, who exchanged ideas and thoughts on the theme Base Erosion and Profits Shifting (BEPS).

Distinguished overseas and local scholars and tax experts delivered talks on timely BEPS topics including digital economy, common reporting standard, harmful tax practices and transfer pricing. More than 200 guests and participants, comprising senior executives and tax professionals from public practices and industries, as well as faculty members from different universities and colleges attended for timely updates on the different BEPS topics.



HSUHK Graduation Ceremony 2018 © 2018/11/15



Windpipe Chinese Music Ensemble for "Music Atlas of Hong Kong"

# Coverage in TIHK's Newsletter (Issue No. 204, September 2017)

3-4 Aug

# **TIHK - INSTITUTE NEWS**

# TIHK supported HSMC's Symposium of Taxation: The Era of BEPS

The Symposium aimed to provide a platform for knowledge exchange on tax development in BEPS and the OECD's 15 action plans. Besides being the sole supporting organization, our then-President, Ms Karmen Yeung was also invited to be one of the keynote speakers of the Symposium.









# <u>Photos</u>



Welcome speech by Professor Simon Ho, President of The Hang Seng University of Hong Kong.



Professor Simon Ho presented souvenirs to guest speakers: (from left) Ms Karmen Yeung, Mr Wong Kuen Fai, JP, Mr Michael Olesnicky, Ms Caroline Malcolm, Professor Marie Lamensch and Professor Shi Zhengwen.



Professor Bradley Barnes (1st from right), Dean of School of Business, presented souvenirs to guest speakers: (from left) Mr Benjamin Chan, Mr Bart Kosters, Mr Jeremy Choi and Ms Anita Tsang.



Souvenir to Mr Roy Phan (left), Senior Tax Manager of Deloitte - Hong Kong



Souvenir to Mr Martin Richter (left), Transfer Pricing Partner of EY Greater China



Certificates of Appreciation presented to guest speakers.



Audience focused on the speech delivered by Mr Wong Kuen-fai, Richard, JP, Commissioner, Inland Revenue Department, The Government of HKSAR.



Audience focused on the speech



Networking among guest speakers and participants during coffee break.



Networking among guest speakers and participants during coffee break.



Networking among guest speakers and participants during coffee break.



Networking among guest speakers and participants during coffee break.



Reception desk and student helpers



Backdrop on stage



Signature Board



Promotional banner



Vertical banner



Backdrop at lunch venue

### 7. Research-Related Outcome

7.1 Potential for development into research proposal and the proposed course of action *(Maximum half a page)* 

This Symposium brought together scholars, practitioners and government officials, aimed to bridge the gaps between practical and theoretical perspectives. Many of the participants have established links in order to continue discussions on potential research topics / future collaboration.

7.2 Research collaboration achieved (*Please give details on the achievement and its relevant impact*)

N/A

7.3 Any new development and/or challenging research topic(s) has / have been identified and any new initiative(s) for future research has / have been inspired.

N/A

### 8. The Layman's Summary

(Describe <u>in layman's language</u> the nature, significance and value of the research activities, in no more than 200 words)

### Symposium of Taxation: The Era of BEPS

### What is BEPS (Base Erosion and Profits Shifting)?

By OECD definition, BEPS refers to tax planning strategies that exploit gaps and mismatches in tax rules of different jurisdictions to artificially shift profits to low or no-tax regions where there is little or no economic activity, resulting in little or no overall corporate tax being paid.

Driven by the call from the G20 leaders, OECD commenced work on developing measures and framework to fill up the gaps and mismatches in tax rules of different jurisdictions, to ensure that taxing rights between countries are fairly allocated.

### This Symposium of Taxation

The two-day symposium was held on 3 and 4 August 2017. The Symposium succeeded in bringing together tax practitioners, academics and government officials from Hong Kong, mainland China and other parts of the world to exchange ideas and thoughts on BEPS. It offered a timely platform to bridge the gaps between practical and theoretical perspectives. Guest speakers delivered talks on four key BEPS topics including digital economy, common reporting standard, harmful tax practices and transfer pricing. More than 200 guests and participants attended the event for timely updates on the different BEPS topics.

### Part C: Research Output

9. Recognized Conference(s) Paper(s) Related To This Project Was / Were Delivered (As Applicable)

(Please attach a copy of each conference abstract)

Month / Year / Place	Title	Conference Name	Submitted to RGC (indicate the year ending of the relevant progress report)	to this	Acknowledged the Support of RGC (Yes or No)
	N/A				,

### 10. Research Personnel Trained (As Applicable)

Name	Capacity
N/A	

### 11. Other Impact (As Applicable)

(e.g. prizes, collaboration with other research institutions, technology transfer, etc.)

N/A

### 12. Public Access Of Completion Report

(*Please specify the information, if any, that cannot be provided for public access and give the reasons.*)

Information that Cannot Be Provided for Public Access	Reasons		
N/A			

### RESEARCH GRANTS COUNCIL COMPETITIVE RESEARCH FUNDING SCHEMES FOR THE LOCAL SELF-FINANCING DEGREE SECTOR

# **INTER-INSTITUTIONAL DEVELOPMENT SCHEME (IIDS)**

# **Completion Report - Attachment**

(for completed projects only)

RGC Ref. No.:	UGC/IIDS14/B01/16
Principal Investigator:	Ms. LEE Hau Yee
Project Title:	Symposium of Taxation: The Era of BEPS

### **Statistics on Research Outputs**

	Peer- reviewed Journal Publications	Conference Papers	Scholarly Books, Monographs and Chapters	Patents Awarded	Other Research Outputs (Please specify)
No. of outputs arising directly from this research project [or conference]	Nil	Nil	Nil	Nil	This Symposium brought together scholars, practitioners and government officials, aimed to bridge the gaps between practical and theoretical perspectives. Many of the participants have established links in order to continue discussions on potential research topics / future collaboration.