



香港人才管理協會

**HONG KONG PEOPLE MANAGEMENT ASSOCIATION**

*(Operated by Hong Kong People Management Association Limited)*

2020 HOT TOPICS

## China/Hong Kong Cross-Border Personal Tax

**Date & Time:** 27 Nov 2020 (Friday) at 4:30 - 6:00pm

**Venue:** Online Seminar (via Zoom)  
(Login detail will be sent to participants on 26 Nov 2020)

**Language:** Cantonese

**Fee:** HKPMA Member: HK\$100.00    Student Member: Free of Charge  
Non-Member: HK\$150.00

2020 has been a very dynamic year for cross border personal taxation, ranging from first year launch of the new China annual reconciliation filing and application for Greater Bay Area (“GBA”) individual income tax (“IIT”) financial subsidy, to complex tax and deployment issues arising from remote working and travel disruption.

Similarly, taxpayers in Hong Kong have been facing challenges brought by changes in tax rule and practice such as relief under Section 8(1A)(c) of the Inland Revenue Ordinance is superseded by foreign tax credit (“FTC”) claim if taxpayers are double taxed for working in a double tax treaty counterpart of Hong Kong. They have to qualify as a Hong Kong tax resident for FTC claim purpose.

In October 2020, the minutes of the 2020 annual meeting between the Hong Kong Inland Revenue Department (“IRD”) and the Hong Kong Institute of Certified Public Accountants (“HKICPA”) was released, in which IRD’s views and practice on hot topics ranging from GBA IIT financial subsidy, termination payments, limitation on holdover of salaries tax for FTC cases, certificate of resident status, etc were shared, which are highly relevant to enterprises and individuals in the current economic environment and for working cross border in GBA.

Furthermore, the trend of unplanned travels, extension of stays or remote working pattern due to the outbreak of COVID-19 have disrupted the traditional management of frequent travellers and stationers, leading to issues on tax residence status, unexpected double taxation and demand for change in benefit policies and tax equalisation policy for talent retention and policy competitiveness.

Our Association has invited Louis Lam, China South Leader at PwC Global Mobility Services, and his colleagues to share their insights and recommendation on how enterprises and individuals could better manage the above challenges.



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Topics to be covered in the online seminar include:

- Updates on China IIT Reform – Recap of changes in tax laws and regulations under China IIT reform and experience sharing of the first China annual reconciliation filing for IIT
- Updates on China IIT incentive in Greater Bay Area
- Challenges in foreign tax credit claim and impact on holdover application
- The IRD's view on certain salaries tax issues shared at the 2020 annual meeting between the IRD and the HKICPA
- Tax and HR impact due to unplanned travels, extension of stays and remote working pattern

Speakers:

**Mr. Louis Lam, China south leader, Global Mobility Services**

Louis has over 20 years of experience specializing in Hong Kong / China cross border individual tax consulting and compliance. He advises clients in drafting company policy and employment terms covering housing benefits, remuneration package structuring, tax equalization, termination package and talent mobility policy; negotiate and manage tax audit and penalty; cross border social security planning, etc.

He has extensive experience advising overseas, China and Hong Kong clients in private equity and asset management industries, and leading global financial institutions, to design and enhance pre-/post-IPO employee share based compensation schemes, carried interest plans and co-investment plans, with a holistic approach to cover talent mobility and retention, market trend, tax, foreign exchange, finance, legal, etc. perspectives; and to assist in performing applicable tax and foreign exchange registration and compliance reporting.

**Ms. Iris Lai, Senior Manager, Global Mobility Services**

Iris has 10 years of experience in providing professional services to both employers and employees focusing on Hong Kong / China cross border assignments. She has experience on various types of expatriates' tax compliance and consulting projects, and other mobility related issues. She also advises and develops practical solutions for clients relating to employment and remuneration structures (e.g. equity-based incentive plans, tax equalization policies, housing schemes, employees' compensation and benefit issues and etc).



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**Enquiry:** Ms. Mency Yu at 9151 4268

**Enrolment:** Please email the reply slip to [info@hkpma.net](mailto:info@hkpma.net) or fax to 8343 1285 *on or before 24 Nov 2020* and either (a) post it with a crossed cheque payable to “**Hong Kong People Management Association Limited**” to Room 801 Sunbeam Centre, 27 Shing Yip Street, Kwun Tong, Kowloon, Hong Kong **OR** (b) deposit the cheque directly to “Hang Seng Bank, A/C no. 269-313649-001 and attach the copy of bank transfer receipt to the reply slip.

**Remarks:** Acceptance will be on a first-come first-served basis. Confirmation of enrollment will be subject to receipt of cheque payment to the Association. Confirmation E-mail will be sent after successful enrollment. No refund will be made after payment but substitution may be made by notifying HKPMA at least 3 days prior to day of the function.

### REPLY SLIP

#### China/Hong Kong Cross-Border Personal Tax

On 27 Nov 2020 (Friday)

Participant Name	Position	Email	Member (Y/N)	Fee (HK\$)

Company Name : \_\_\_\_\_

Contact Person : \_\_\_\_\_ Contact Tel. : \_\_\_\_\_

Signature : \_\_\_\_\_ Date : \_\_\_\_\_

NOTE: If the event is cancelled due to any unforeseen circumstances such as bad weather or natural disaster, the HKPMA is not responsible for any expenses incurred by the registrant. Notice of the reschedule arrangement will be sent out within 7 working day.