

# Asia Tax Summit 2010



*Doing business cross  
border and getting an  
internationalized vision  
of taxation*

*October 19-21, 2010 - Shanghai  
Grand Melia Shanghai*



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**asiaTax Summit 2010**  
Getting Internationalized Vision of Taxation

## Doing business cross border and getting an internationalized vision of taxation

October 19-21, 2010 • Shanghai  
Grand Melia Shanghai

### Background

With the rebound of global economy, investment opportunities and favorable environment are the factors investments looking for. Doing business cross border in a tax-efficient way becomes the common target of tax executives. After countries in America and Europe's suffering from the great crisis, Asia, the region developing in a steady pace is drawing much more attention than ever before. Countries throughout the area used tax policy to deal with faltering economies. Some cut income tax rates, others introduced new reliefs, and more amended regulations to help companies during the difficult time. What did they do in 2010 to adapt to the changes?

The conference addressed specific difficulties faced by Asian tax executives and finance management in the taxation of a sector which forms a big part of our economies. In particular, it highlighted best practices in acting against changing tax systems for international businesses, and discussed options to manage the potential tax risks in doing business in the region.

ATS moves to China in 2010 for the first time. Aiming at helping executives to understand the taxation systems in Asian countries for overall success in doing business cross-border, this conference facilitates public sector officials as well as tax executives in the region to discuss problems, learn from comparative experience and tap business expertise in international tax planning to help meet challenges.

### In this conference, you will learn

- Overall landscape of investments and taxation system in Asia
- Latest updates of tax related policies in Southeast Asia, China, India and Australia
- Practical tips on tax planning, direct/indirect tax, transfer pricing and etc
- Tax policies of hot spot of investments
- Best practices in tax administration around Asia

### Who should attend?

- Tax Practitioners
- Tax Agents
- Accountants
- CEOs
- Directors
- Senior Managers
- Executives
- Company Secretaries
- Bankers
- Financial Planners
- Advocates & Solicitors
- Investors
- Academicians
- Government Officials
- Other Interested Parties

## October 19, 2010: Pre-Conference Workshop: Hot Destinations of Investments

### Stream One: Investing in Vietnam

#### *Comprehending the tax and legal implications of FDI into Vietnam*

- Vietnam at a glance: The country & the market; political developments and the reform process
- Complying with the tax and regulatory framework in Vietnam
- Tax incentives and major taxes
- Foreign exchange control & repatriation of funds
- Other considerations

#### *Foreign Investment Structure & Tax Regime in Vietnam*

- Developments of Vietnam's investment climate
- Regulatory framework for foreign investment
- Forms of investment in Vietnam
- Tax issues in M&A in Vietnam
- Corporate vehicles and consideration for each option
- Tax regime for foreign investment
- Future tax reforms and their implications

### Stream Two: Leader of Go-West Campaign—Chengdu Taxation

Sichuan's provincial capital Chengdu is the most prosperous city in Western China. In 2008, Chengdu GDP reached RMB390 billion, a year-on-year growth of 7.5%.

The city's strength is in its service industries such as financial services and Information and Communication Technology (ICT). Among all inland Chinese cities, Chengdu has the biggest insurance market, the busiest aviation hub, as well as the second largest economy and banking markets. Chengdu's listing among the Top 30 on Forbes List of the best commercial cities in China is another significant leap forward to become increasingly on par with Beijing, Shanghai and Guangzhou. Chengdu is focused on developing its services industry, particularly in industries like education, electronics and ICT, environment, healthcare, infrastructure, transport and logistics.

A program called "Develop the West," introduced in 2000, has improved highways, railroads, airports, and electric grids, making the southwest far more attractive to investors. Incomes are lower than on the coast. But they're rising fast as the infrastructure projects and new foreign-owned factories create jobs.

#### ***In this session, you will learn:***

- Why Chengdu?
- Preferential taxation policies in Chengdu
- Tax planning techniques while setting up companies in Chengdu
- Future outlooks of policies and infrastructures

## October 20, 2010

08:00 Registration

08:45 Opening from the Chair

### Part One: General Landscape—what's going on in Asia right now?

09:00 Important developments, trends and their implications of Taxation in China - Key changes

- Provisional regulations and implementation rules on indirect taxes
- Important tax, investment and foreign exchange regulations

09:45 Analyzing the Latest Tax Development in Southeast Asia

- General overview of tax aspects pertaining to Southeast Asia
- Addressing tax residence of a company
- The double tax relief system
- Distribution of profits

Chris Devonshire-Ellis, Senior Partner, Dezan Shira & Associates

10:30 Tea Break

10:50 Inbound Planning for Doing Business in India and Recent Amendments

- Proposed goods and services tax in India.
- New rules and tax measures in India
- Tax treaties
- Analysis of recent circulars & case law on service tax
- Case studies of investing in India

Vijay K. Dhingra, Managing Director, India Tax Services, Deloitte AP ICE, Ltd.

11:35 Use of Hong Kong in international Tax Planning

- Overview of tax system and updated tax policies in HK in 2010
- DIPN46 and its implications to Mainland China companies
- Tax treaties
- Maximize tax-free offshore profits with Hong Kong
- Case study of using HK in international tax planning

Dicky To, Managing Director, RSM Nelson Wheeler Tax Advisory Ltd.

12:20 Lunch

### Part Two: International Tax Planning

14:00 Leveraging on Tax Treaties in cross-border Tax Planning  
Brendan Kelly, Principal, Baker & McKenzie LLP

15:00 Tea Break

15:30 Tax Planning Tools & Software

- Recent innovations of taxation solutions
- Development trends
- Meeting your demands: what do you need?
- Creating your demands: what do I offer?

16:15 Panel Discussion

Intergrowth: outlook of China-ASEAN and free trade zone of East Asia

17:15 End of Day One

## October 21, 2010

08:00 Registration

08:45 Opening Remarks from the Chair

### Part Three Indirect Tax

09:00 China's foreign exchange policy updates and suggestions for tax planning: inbound & outbound

- What the policies are like right now and will be in the recent future?
- Benefits for FDI and the Going-abroads
- What you should do in the daily operations?

Senior Official, State Administration of Foreign Exchange, PRC  
Senior Official, State Administration of Taxation, PRC

10:30 Tea Break

11:00 Asia Customs Landscape Showcase

- China & Hong Kong
- Southeast of Asia
- India

Sarah Chin, Partner, Indirect Tax, Deloitte Touche Tohmatsu CPA Ltd.

Bob Fletcher, Leader, Asia Pacific, Customs & Global Trade Services, Deloitte Touche Tohmatsu CPA Ltd.

11:45 Refunding Export Taxes

- System of refunding taxes on exported goods and its update in 2010 in the key countries of Asia
- Refunding export taxes in China
- VAT/GST issues in refunding export taxes
- Use of refunding export taxes policy in the international tax planning

Robert Tsang, Director of Tax, Deloitte & Touche LLP

Sarah Chin, Partner, Indirect Tax, Deloitte Touche Tohmatsu CPA Ltd.

12:30 Lunch

### Chapter Four Tax Planning Practices

14:00 Defining, Managing and Evaluating Intangibles for Transfer Pricing

- General understanding of the nature of intangible assets and the new trends in transfer pricing
  - Comparison of transfer pricing policies when intangibles are involved;
  - Identifying and separating product, process and marketing intangibles
  - Examining economic analyses of intangibles - methodologies and tools
- Cheng Chi, Partner-in-charge, Global Transfer Pricing Services (China & HK SAR), KPMG Advisory (China) Limited

14:45 Managing TP Risks in China in 2010

- Do you need documentation?
- What is best practice documentation?
- How are tax authorities dealing with transfer pricing in 2010?
- How to manage TP risk going forward

Steven Carey, Partner, Transfer Pricing Associates (Hong Kong) Ltd.

15:30 Tea Break

16:00 Tax Planning in Cross-border M&A

- Tax structure planning and post trade operation
- Financing structure and tax model planning
- Tax due diligence
- Capital structure planning

Clare Lu, Partner, Llinks

17:00 Panel Discussion

The future of the corporate tax department

- How have the last two years changed the way a department operates
- The corporate tax department of 2020
- How the role of the chief tax executive is changing
- Staffing and recruitment
- The service providers of the future
- Outsourcing

17:30 End of Conference