

**JOINT WEBINAR on  
Hong Kong's new regime for taxing foreign source income  
– how does this affect trust and other wealth planning structures?**

Speakers: Wenwen Chai, Senior Associate, Karas LLP in Association with Mishcon de Reya  
Van Lai, Tax Director, Tricor  
Stefano Mariani, Partner, Deacons

Date: Monday 5 December 2022

Time: 5pm – 6pm

CPD point: One point for HKTA Certified Trust Practitioner™

Fee: HK\$250 (member); HK\$300 (non-member)

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**This session will cover:**

Bowing to pressure from the EU, the Hong Kong government has introduced a Bill into LegCo which will impose tax on certain types of foreign sourced income such as dividends, interest, royalties and even capital gains from the sale of equities. These new rules will take effect from 1 January 2023 and will have a profound impact on the businesses of many of our members. Taxpayers will in many cases be able to take advantage of a number of exemptions, but this will likely require prior planning. The issue for the trusts and wealth management industry is how these changes will affect typical types of trust structures and offshore companies that have been established for our clients. In this session, a panel comprising trusts and tax lawyers and representatives of trustee companies will explain how these changes will affect your business and what planning you need to do to avoid the harsh rigour of these new tax rules. This is a must-attend session which has been tailored to address the concerns of the trustee and the corporate services business sectors.

**About the speakers:**

**Wenwen Chai, Senior Associate, Karas LLP in Association with Mishcon de Reya**

Wenwen Chai is a Senior Associate of Karas LLP in Association with Mishcon de Reya. Her practice focuses on advising high net worth individuals, families and trustees on tax, stamp duty and succession planning matters.

She has experience in advising Hong Kong, PRC and international clients on the establishment and restructuring of family trust structures. She also regularly works with individual and corporate clients in the establishment and ongoing administration of charitable organisations.

Another part of her practice involves advising on Hong Kong profits tax and stamp duty issues in corporate transactions, in both advisory and contentious settings. In addition, she has considerable experience on advising US and PRC multinational companies on Hong Kong tax issues arising from employee share schemes.

### **Van Lai, Tax Director, Tricor**

Van Lai is Tricor's Tax Director based in Hong Kong. He has over 18 years' tax and business experience in providing tax advisory and compliance services to multinationals and Hong Kong corporations on corporate tax matters with a focus on cross border and international tax issues, mergers and acquisitions, pre-IPO restructuring in relation thereto, tax treaty benefits application and also dispute resolutions with the tax authorities.

He has extensive experience in advising clients across multiple industries including hotel and hospitality, pharmaceutical, real estate & construction, technology & telecom, trading & retail, manufacturing and logistics industry. He also provides tax consulting services to financial institutions, investment banks, private equity and insurance companies.

He has also worked on personal and business tax advices in supporting private/ family enterprises, family offices and their owners to conceptualize and implement tax structures for their preferred jurisdiction.

### **Stefano Mariani, Partner, Deacons**

Stefano Mariani (MA (Oxon), MSc (LSE)) heads the tax and trusts practice at Deacons, the oldest and largest law firm in Hong Kong. Stefano was called to the Bar of England & Wales by Lincoln's Inn and is admitted as a solicitor-advocate in Hong Kong. He practises both advisory and contentious Hong Kong and international tax and trusts law, and has argued revenue law appeals before the Inland Revenue Board of Review and the higher courts. He is Adjunct Assistant Professor of the Faculty of Law of the University of Hong Kong, the Hon. Secretary of the Hong Kong Trustees' Association, a Trusts and Estates Practitioner (STEP), and an honorary fellow of the Asian Institute of International Financial law. He is active in academic research in Hong Kong tax law, and is a co-author of the Encyclopaedia of Hong Kong Taxation – the seminal Hong Kong textbook on revenue law – and of various other textbooks aimed at law students and candidates sitting for qualification exams set by the Hong Kong Institute of Certified Public Accountants. He has published widely on tax law and policy in leading newspapers and journals, including in the South China Morning Post, the Asia-Pacific Tax Bulletin, and the Asia-Pacific Journal of Taxation. He is also a member of the Executive Committee of the Hong Kong branch of the International Fiscal Association, and of the Revenue Bar Association in London.

**Important note:** Webinar facility will be provided by STEP. In order to create access to the STEP Zoom platform, participants' names and email addresses will be passed to STEP upon registration with HKTA. A link will be provided to each participant 2 days prior to each webinar. **The presentation materials will not be shared with the participants after the webinar.**

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Topic: Hong Kong's new regime for taxing foreign source income – how does this affect trust and other wealth planning structures?  
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Name of Company \_\_\_\_\_

Name(s) of Attendee(s) \_\_\_\_\_

Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_

(Please provide email address of each attendee for sending confirmation of webinar link and attendance certificate)

Email: \_\_\_\_\_ Mobile: \_\_\_\_\_

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HK\$250 (member) x \_\_\_\_\_ Person = HK\$ \_\_\_\_\_

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3. e-Attendance certificate will be issued within 10 working days after the webinar. **Attendees must provide and sign in the webinar with the same full name provided in this enrolment form.**
4. In order to be eligible to HKTA CPD hours, participants are required to attend the entire webinar from 5:00pm to 6:00pm. Webinar recording is NOT available.
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