

# **32<sup>nd</sup> Annual Asia Pacific Tax Conference**

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**JW Marriott Hotel Hong Kong**



# Audits, whistleblowing and loose lips

Tax practice in the age of transparency and political polarization

Chair: Steven Sieker, Hong Kong

Christian Brodersen, Germany

Serena Chow, Sydney

Scott Frewing, Palo Alto

Jason Liang, Kuala Lumpur

Jinghua Liu, Beijing

Allen Tan, Singapore

As a result of political and social changes, tax planning and tax disputes are increasingly conducted under the public scrutiny of journalists and politicians, often with incomplete information and specific political agendas.

How should taxpayers and tax advisors respond to these changes? What are the key changes to be aware of?



# European State Aid and BEPS developments:

- To what extent are governments resorting to alternatives outside domestic tax laws to address public perceptions of "fairness"?
  - "Harmful" tax competition and "base erosion"
  - country by country reporting and publication
  - information exchange
  - state aid
- What will this mean for source jurisdictions like Hong Kong, Singapore and Malaysia? Is there a future for tax incentives?

# More aggressive audits and enforcement

- Are tax authorities more aggressive?
- Are we seeing the use of new or unusual enforcement tactics?
- Are we seeing new legislative developments that are changing the rules?
- What can companies do to address the risk?



# Whistle blowers

- Do tax authorities in your jurisdiction offer rewards to whistle blowers?
- Are the rewards a % of the tax collected?
- Will tax authorities buy information for cash?



# Communicating about tax

Internal communications may end up in the public thanks to Wikileaks and ICIJ efforts. Taxpayers are being called to testify before Congress or Parliament. Tax is now front page news for multinationals and wealthy individuals. How should we communicate about tax in an environment where information might be publicly disclosed?



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