

A photograph of a traditional Japanese bridge with orange railings and stone pillars, set against a backdrop of lush green trees and a river.

WTS Global: Asia Roadshow 2019

# Asian Responses to BEPS, Digital Tax and Growing Trade Tensions

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Asia is home to some of the fastest growing economies in the world and some of the most digitalised societies such as China and South Korea. However, Asia is not immune to the seismic developments in international tax and global trade tensions.

In light of the BEPS issues which resulted in the OECD/G20 BEPS project, Asian countries continue to have their own responses. Some have adopted recommendations coming out of the OECD/G20 BEPS project. Others have implemented unilateral measures. The diversity of approaches has given rise to further complexity in navigating the tax regimes in Asia.

The recent U.S.-China trade war and the trade tensions between Japan and South Korea have added to additional stress points to businesses operating in Asia. It has resulted in dislocation of existing global supply chains and have required businesses to be agile in adapting to the shifting international trade landscape.

Global businesses need to understand and respond quickly to these changes that are taking place in Asia and the rest of the world. This requires a holistic appreciation of how developments in one country impact operations in another. Businesses that are able to make good strategic decisions and execute in an agile manner conventional and digital strategies will prevail over companies that fail to recognise the dire impact of these developments to their operations.

WTS Global is pleased to present our experts from ASEAN, China, India and South Korea to provide you with their perspectives on how these developments are affecting businesses in Asia. We hope you will be able to join us for this insightful session.

Our speakers will also be available to meet with you for one-on-one meetings around their presentation on request.

## Speaker Profiles



**Eugene Lim**

Asia Chief Operating Officer,  
WTS Global

Eugene has about 20 years of experience advising on international tax and trade issues in Asia. Eugene has assisted many multinationals and international businesses with their global supply chain structures as well as on some of their most significant tax and trade disputes in Asia.

Originally from Singapore, Eugene spent over 10 years in Hong Kong and China in the early 2000s and experienced China's transformation from the factory of the world to a consumption based market.

Eugene is now based in Singapore and was recently appointed WTS Global's Asia Chief Operating Officer and is responsible for developing WTS Global's Asia practice. Prior to joining WTS Global, Eugene was Baker McKenzie's International Commercial & Trade Practice Asia Pacific Chair and Head of the Singapore Tax, Trade and Wealth Management Practice.



**Sam Sim**

Asia-Pacific Transfer Pricing  
leader WTS Global, Digital  
Taxation Thought Leader

Sam is senior advisor, University of Vienna Institute for Austrian and International Law Global Tax Policy Center, advisor to the UK Chartered Institute of Taxation ADIT committee and a member of both the New York University School of Law Practice Council and the International Association of Tax Judges.

Sam was Regional Vice-President (Europe, Middle-East, Africa, Asia and Latin America) of Tax Executive Institute. He has led global teams as Deputy Global Head of Transfer Pricing and Transfer Pricing Geo Leader for EMEA and Asia-Pacific in large Fortune 100 MNEs. He is passionate in digital taxation holding appointment at the Center for Artificial Intelligence at Singapore Management University, co-authoring IEEE and IBM Research papers and lecturing at the Master of Tax level courses at a number of universities. He is the author of The Logic and Practice of Transfer Pricing (Lexis-Nexis) and co-editor of Asia Voices: BEPS and Beyond (IBFD).

He was a tax attorney in New York, is a CPA and holds graduate degrees in Law (NYU LL.M.(Taxation), Economics (M.A., Cambridge University) and Accounting (MPA, SMU).



**Dinesh Kanabar**

CEO & Partner  
Dhruva Advisors

With over 35 years of professional service experience, Dinesh has been recognized by his peer group as amongst the top tax advisors in India. His ability to relate the business strategies of clients to the tax and regulatory environment has been recognized as unique and has played a critical role in evolving solutions for client.

He has served as the Deputy CEO of RSM & Co, a leading tax boutique in India and subsequently led the tax and regulatory practice of PricewaterhouseCoopers (PwC) upon the merger of RSM & Co with PwC. He has also served as Chairman of KPMG's tax practice.

Dinesh is a member of the National Committee of FICCI and has worked with the Government on several Policy Committees. He was a member of the Rangachary Committee constituted by the Prime Minister of India to deal with tax reforms in the IT/ITES sector and for evolving Safe Harbour Rules.



**Shin-Jong Kang**

Tax Partner, Tax and FAS Group  
Young & Jin Accounting  
Corporation

Shin-Jong Kang is the managing partner of Tax and FAS Group at Young & Jin Accounting Corporation ("Young & Jin"). Prior to joining Young & Jin in November 2017, he was the partner at Yoon & Yang LLC, one of the largest law firms in Korea and worked for four years as the head of the International Tax and Transfer Pricing Group developing the international tax practice for the law firm as the experienced senior partner. Prior to joining Yoon & Yang in July 2013, he was the tax partner in the tax group of Samil PricewaterhouseCoopers (Samil PwC).

He has over 30 years of experience providing tax advisory services to major foreign and Korean multinational companies and financial services companies. He has been frequently invited as the external advisor by the Korea National Tax Service and the Ministry of Strategy and Finance in developing the transfer pricing guideline and new transfer pricing regulations. He is the Korean Member of BIAC Committee on Tax and Fiscal Policy, member of the Korean Institute of Certified Public Accountants and holds a bachelors' degree in Business Administration from Korea University and a masters' degree in Business Administration from the Graduate School of Seoul National University.



**Martin Ng**

Managing Partner, WTS China

Martin has 29 years of professional service experience, with 4 years in management consultancy and 25 years in China tax and customs advisory, specializing in China corporate tax, marketing entry, foreign exchange and customs related advisory services. Former Big Four accounting firm's China tax partner.

He used to be a tax partner in Hangzhou and Shanghai, and a national knowledge management leader for a Big 4 firm in China. He has witnessed and participated in the growth of the tax consulting practice of two Big 4 firms, from a shoestring to a full-fledged operation. He has been a frequent speaker to various seminars and trainings. He is appointed as a freelance trainer to some internal tax cadets trainings, and a guest lecturer and a thesis reviewer for a Master of Tax course of a tier-one Shanghai university. He holds graduate degree in accounting (MPA, Chinese University of HK) and business administration (MBA, Cardiff University, UK).



**Ened Du**

Senior Manager (Tax / Finance)  
Department Head, WTS China

Ened has over 11 years practical experiences in tax advisory for companies doing business in China. She has constantly providing tax consulting services to many multi-national companies for doing business in China. Having accumulated rich knowledge in practical dealing with Permanent Establishment (PE) projects and specially in the PE defense, Ened is the author to the publication, "Taxation of PE in China". She is responsible for the global mobility service in China in providing a full-fledged expatriate service. She is also widely involved in supply chain structuring, tax health check and due diligence, customs issues, cross border transactions including cash repatriation and other related tax matters. Before joining WTS, she has worked in the tax department of a well-known multi-national accounting firm.