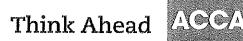
65 years in Hong Kong





The Commissioner of Inland Revenue Inland Revenue Department Revenue Tower 5 Gloucester Road Wan Chai Hong Kong

Attention: Mr. Brian Chiu

1st September 2015

Dear Sir **Transfer Pricing**

Transfer pricing is one of the most important yet complex topics in international tax development. To reinforce Hong Kong as an international financial centre and attract investment, Hong Kong has to put in place a tax system in line with international tax practice, incorporating clear and proper guidelines and documentations on transfer pricing.

ACCA has set up a dedicated transfer pricing task force comprising tax experts from leading international consultancy firms. The task force has come up with a proposal for enhancing Hong Kong tax system in handling transfer pricing. We hereby attach our proposal for your perusal.

We would very much appreciate it if we can set up a meeting between ACCA task force members and Inland Revenue Department to further elaborate and discuss our recommendations. Grateful if you could suggest a few convenient time slots in the next two months for our meeting.

Thank you very much for your attention. We look forward to hearing from you soon.

Members of ACCA Transfer Pricing Task Force
Cecilia Lee, Partner, Transfer Pricing Services, PwC
Patrick Cheung, Partner Tax and Business Advisory Services, Deloitte
Stanley K.F. Ho, Principal, tax, KPMG Tax Limited
John Kondos, Partner, Tax, Global Transfer Pricing Services, KPMG
Kenny Wei, Director, International Tax Services, Transfer Pricing, EY
Martin M Richter, Partner, International Tax Services, Transfer Pricing, EY
Fergus Wong, Director, Tax Services – National Tax Policy Services, PwC
Davy Yun, Partner, Tax Services, Deloitte Touche Tohmatsu
Kenneth Wong, Partner, Tax Services, PwC

65 years in Hong Kong



Yours faithfully,

Davy Yun

Co-Chairmen of Tax Sub-Committee

Enclosures