

China Tax Weekly Update

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Reference: SAT
Announcement [2016] No. 48
Issuance date: 25 July 2016
Effective date: 9 April 2016

Relevant industries: All
Relevant companies: All
Relevant taxes: CIT / IIT

Potential impacts on
businesses:

- Effective tax burden reduced

You may click [here](#) to access full content of the circular.

New China-Russia DTA takes effect

On 25 July 2016, the State Administration of Taxation (SAT) issued SAT Announcement [2016] No. 48 ("Announcement 48") to clarify the *Agreement Between the People's Republic of China and the Russian federal government for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital* ("New DTA") and its *Protocol*. The New DTA and its Protocol were signed on 13 October 2014 and 8 May 2015 in Moscow, respectively, and formally became entered into force on 9 April 2016. Announcement 48 mentions that all required approval procedures from the China and Russia sides have been fulfilled. The New DTA shall enter into effect and apply to income derived after 1 January 2017.

Compared with the DTA between the China and Russia signed on 27 May 1994 ("Old DTA"), main changes in the New DTA are on the following pages.

*It is notable for the following most important changes in the New DTA which make the new China-Russia DTA the best Chinese DTA in relation to interest, royalties and capital gains:

- ❖ The New DTA reserves exclusive taxing rights over interest to the resident country. This means that no withholding tax shall be applied by the country from which the interest is paid. In the Old DTA, the withholding tax rate was 10%.
- ❖ The New DTA reduces the withholding tax rate from 10% to 6% on all royalties.
- ❖ The New DTA abolishes the rule that withholding tax shall be paid to the source country when gains from the alienation of shares representing a participation of at least 25% per cent in a company. It reserves exclusive taxing rights over capital gains to the resident country, with the only exception when more than 50 per cent of the share value directly or indirectly is derived from immovable property situated in the source country.

** China and Russia are looking to deepen economic cooperation and the China-Russia DTA is a clear evidence of this.

	New DTA	Old DTA
Article 4 Resident	<ul style="list-style-type: none"> The term “resident of a Contracting State” means any person who, under the laws of that State, is liable to tax therein by reason of his domicile, residence, <u>place of incorporation, place of effective management</u> or any other criterion of a similar nature, and also includes that and any political subdivision or local authority thereof. 	<ul style="list-style-type: none"> The term “resident of a Contracting State” means any person who, under the laws of that State, is liable to tax therein by reason of his domicile, residence, place of head office or any other criterion of a similar nature.
Article 5 Permanent Establishment (“PE”)	<ul style="list-style-type: none"> The furnishing of services, including consultancy services, by an enterprise through employees or other personnel engaged for such purpose, but only if activities of that nature continue (for the same or a connected project) <u>within a Contracting State for a period or periods aggregating 183 days in any twelve month period commencing or ending in the fiscal year concerned</u> “PE” shall be deemed not to include: <ul style="list-style-type: none"> <input type="checkbox"/> <u>the maintenance of a fixed place of business solely for any combination of activities mentioned in sub-paragraphs a) to e), provided that the overall activity of the fixed place of business resulting from this combination is of a preparatory or auxiliary character (New)</u> 	<ul style="list-style-type: none"> the furnishing of services, including consultancy services, by an enterprise of a Contracting State through employees or other engaged personnel in the other Contracting State, provided that such activities continue for the same construction project or a connected construction project for a period or periods aggregating more than 18 months.
Article 9 Associated enterprises	<ul style="list-style-type: none"> <u>Where</u> <ul style="list-style-type: none"> <input type="checkbox"/> <u>an enterprise of a Contracting State participates directly or indirectly in the management, control or capital of an enterprise of the other Contracting State, or</u> <input type="checkbox"/> <u>the same persons participate directly or indirectly in the management, control or capital of an enterprise of a Contracting State and an enterprise of the other Contracting State,</u> <p><u>and in either case conditions are made or imposed between the two enterprises in their commercial or financial relations which differ from those which would be made</u></p> 	

	New DTA	Old DTA
Article 9 Associated enterprises (cont'd)	<p><u>between independent enterprises, then any profits which would, but for those conditions, have accrued to one of the enterprises, but, by reason of those conditions, have not so accrued, may be included in the profits of that enterprise and taxed accordingly (New)</u></p> <ul style="list-style-type: none"> • <u>Where a Contracting State includes in the profits of an enterprise of that State – and taxes accordingly – profits on which an enterprise of the other Contracting State has been charged to tax in that other State and the profits so included are profits which would have accrued to the enterprise of the first-mentioned State if the conditions made between the two enterprises had been those which would have been made between independent enterprises, then that other State shall make an appropriate adjustment to the amount of the tax charged therein on those profits. In determining such adjustment, due regard shall be had to the other provisions of this Agreement and the competent authorities of the Contracting States shall, if necessary, consult each other</u> 	
Article 10 Dividends	<ul style="list-style-type: none"> • If the beneficial owner of the dividends is a resident of the other Contracting State, the tax so charged shall not exceed: <ul style="list-style-type: none"> ❑ <u>5 per cent of the gross amount of the dividends if the beneficial owner is a company (other than a partnership) which holds directly at least 25 per cent of the capital of the company paying the dividends and this holding amounts to at least 80,000 Euros or its equivalent in any other currency (New)</u> ❑ 10 per cent of the gross amount of the dividends in all other cases 	<ul style="list-style-type: none"> • If the recipient is the beneficial owner of the dividends the tax so charged shall not exceed 10 per cent of the gross amount of the dividends

	New DTA	Old DTA
Article 11 <i>Interest</i>	<ul style="list-style-type: none"> Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State (According to the Protocol, taxing power on interests are exclusively entitled to the resident country and the withholding tax shall be exempted at the country where the interest is paid by its resident.) 	<ul style="list-style-type: none"> Interest arising in a Contracting State and paid to a resident of the other Contracting State may be taxed in that other Contracting State. However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the recipient is the beneficial owner of the interest the tax so charged shall not exceed 10 per cent of the gross amount of the interest
Article 12 <i>Royalties</i>	<ul style="list-style-type: none"> If the beneficial owner of the royalties is a resident of the other Contracting State, the tax so charged shall not exceed <u>6 per cent</u> of the gross amount of the royalties 	<ul style="list-style-type: none"> If the recipient is the beneficial owner of the interest the tax so charged shall not exceed 10 per cent of the gross amount of the interest
Article 13 <i>Capital Gains</i>	<ul style="list-style-type: none"> Gains derived by a resident of a Contracting State from the alienation of shares deriving <u>more than 50 per cent</u> of their value directly or indirectly from immovable property situated in the other Contracting State may be taxed in that other State 	<ul style="list-style-type: none"> Gains from the alienation of shares of the capital stock of a company the property of which consists directly or indirectly principally of immovable property situated in a Contracting State may be taxed in that State Gains from the alienation of shares other than those mentioned above representing a participation of at least 25 per cent in a company which is a resident of a Contracting State may be taxed in that State

The Limitation-on-benefits (LOB rule) from the BEPS Action 6 report is taken onboard in the New DTA. Under the LOB, the country where the income sourced shall, through a complex series of tests, judge whether there is sufficient link between entity with its resident country or whether the set-up of entity is just for treaty benefits purposes. The treaty benefits shall not be available if the tests are failed.

Principle purpose test (PPT rule): In order to prevent treaty abuse are subject to PPT in the New DTA. If principle purposes of an arrangements in relation to shares, debt-claims or other rights that has been entered into is to obtain a benefit under the treaty, the treaty benefit shall not be available. (According to the interpretation of SAT Announcement [2016] No. 48, if Chinese tax authority denies to grant the treaty benefits to taxpayers, the procedure shall follow the provisions of general anti-tax avoidance.)

It might also be noted that, for exchange of information (EOI), the New DTA includes the 2005 OECD Model Tax Convention version of Article 26. This adds provisions to regulate that a contracting state shall not decline to supply information solely because it has no domestic interest in such information or the information is held by a bank, other financial institution or individual. It might be noted that the adoption of this provision in DTAs is subject to the peer-review of the OECD Global Forum on EOI and Transparency.

(BEPS Action 7 - "Preventing the Artificial Avoidance of Permanent Establishment Status" put forward some suggestions to revise PE articles, such as use of commissionaire arrangement, preparatory or auxiliary condition, solutions to splitting-up of contract, etc., which have not been included in the New DTA and its Protocol.)

* SAT has published the New DTA on its website, You may click [here](#) to access full content of the New DTA.

Reference: SAT
Announcement 2016 No. 49
Issuance date: 26 July 2016
Effective date: 1 July 2016

Relevant industries: All
Relevant companies:
Enterprises engaged in
international air
transportation
Relevant taxes: VAT

Potential impacts on
businesses:

- Effective tax burden reduced

You may click [here](#) to access full content of the circular.

China-Poland air transport tax agreement takes effect

As mentioned in KPMG [China Tax Weekly Update \(Issue 24, June 2016\)](#), China and Poland signed the *Agreement between the Government of the People's Republic of China and the Government of the Polish People's Republic on Mutual Exemption of VAT or Similar Taxes over International Air Transport Services* ("Agreement"). The signing of the Agreement will, on the basis of mutual exemption of income tax over international air transport as provided for in the China-Polish DTA, further reduce the tax burdens of indirect taxes of the enterprises of the two countries engaged in international air transport.

On 26 July 2016, the SAT issued Announcement to officially clarify that the Agreement will come into effect from 1 July 2016.

* Prior to this, China has realized exemption of indirect taxes over international transport services with over 60 countries/regions in the form of different types of inter-governmental agreements such as tax agreements, international transport agreements and exchange of documents between the governments.

Reference: Hu Fu Fa [2016] No. 54 / Shanghai LTB Announcement 2016 No.1 / Yu Cai Shui [2016] No. 81
 Issuance date: 23 July 2016 / 27 July 2016 / 2 August 2016
 Effective date: N/A

Relevant industries: All
 Relevant companies: All
 Relevant taxes: Resource Tax

Potential impacts on businesses:

- Compliance costs reduced
- Operational costs increased

You may click the circular titles to access full content of the circulars.

SAT and local authorities to further drive Resource Tax reform

As mentioned in KPMG [China Tax Weekly Update \(Issue 18, May 2016\)](#), on 9 May 2016, the Ministry of Finance (MOF), the SAT and the Ministry of Water Resources (MWR) issued three circulars, to comprehensively implement the Resource Tax reform across China beginning on 1 July 2016.

4 July, the Property and Behavior Taxation Department of SAT provided an in-depth interpretation on Resource Tax reform in the form of [Q&A](#).

23 July, Shanghai Government issued [Implementation rules of levying Resource Tax on clay and mineral water resources](#) (Hu Fu Fa [2016] No. 54), to clarify Resource Tax rates for clay and mineral water resources that shall be levied on a volume basis.

27 July, Shanghai Local Tax Bureau (LTB) issued [Administrative measures for collection of Resource Tax for clay and mineral water resources](#) (Shanghai LTB Announcement [2016] No.1). This clarifies the accounting method, calculation formula of tax payable, timing of occurrence tax payment obligation, declaration form amongst other matters.

2 August, Chongqing Finance Bureau issued [Notice on comprehensive implementation of Resource Tax reform](#) (Yu Cai Shui [2016] No. 81). This clarifies the taxation methods, applicable tax rates, income distribution system of Resource Tax.

* With regard to the implementation rules of the Resource Tax reform and the impacts to enterprises, you may click KPMG [China Tax Alert \(Issue 18, June 2016\)](#) for more details.

Reference: CSRC Announcement [2016] No. 8
 Issuance date: 4 July 2016
 Effective date: 1 May 2016

Relevant industries: All
 Relevant companies: All
 Relevant taxes: VAT

Potential impacts on businesses:

- Compliance costs reduced

You may click the circular titles to access full content of the circulars.

Further VAT implementation rules from CSRC

In order to help better implement the new VAT rules *Measures for Implementation of the Pilot Program of VAT Reform (Cai Shui [2016] No. 36, "Circular 36")*, the China Securities Regulatory Commission (CSRC) issued Announcement [2016] No. 8 to put forward the opinions for the financial securities industry under the VAT reform.

- ❑ [CSRC's opinions for institutions operating securities, futures and funds under the VAT reform](#)

The State Council, the MOF and the SAT have recently issued many circulars for the implementation of Circular 36. You may click KPMG *China Tax Weekly Update* [Issue 13](#), [Issue 14](#), [Issue 15](#), [Issue 16](#), [Issue 17](#), [Issue 18](#), [Issue 19](#), [Issue 20](#), [Issue 21](#), [Issue 22](#), [Issue 23](#), [Issue 24](#), [Issue 25](#), [Issue 26](#) and [Issue 27](#), [Issue 28](#) and [Issue 29](#) to understand the details.

* On the occurrence of Circular 36 announcement, KPMG immediately issued a series of China Tax Alerts to provide an overview of the high level policies and general impacts across all industries. Focusing on construction, real estate, finance and lifestyle services, at the same time, we also issued specific alerts for each of the three major industries affected by these changes. You may click the following links to read:

- ❑ [China Tax Alert: China's new VAT rates & rules –high level policies and general impacts across all industries \(Issue 9, March 2016\)](#)
- ❑ [China Tax Alert: China's new VAT rates & rules –Financial Services impacts \(Issue 10, March 2016\)](#)

- ❑ [China Tax Alert: China's new VAT rates & rules –Lifestyle Services impacts \(Issue 11, March 2016\)](#)
- ❑ [China Tax Alert: China's new VAT rates & rules -Real Estate & Construction industry impacts \(Issue 12, March 2016\)](#)

** In addition, the MOF and SAT issued Circular 68 to further clarify VAT treatment of services in regard of reinsurance arrangements, lease of immovable properties and non-academic education. Also, Circular 70 was issued to further clarify the VAT reform policies on financial industry. KPMG has issued two China Tax Alerts to detail the tax impact to reinsurance, insurance and financial services, you may click the following links to read:

- ❑ [China Tax Alert: New Circular clarifies China's VAT treatment of reinsurance arrangements \(Issue 17, June 2016\)](#)
- ❑ [China Tax Alert: New Circular expands upon China's VAT exemptions for financial services industry \(Issue 20, July 2016\)](#)

Reference: Gong Shang Qi
Zhu Zi [2016] No.150
Issuance date: 28 July 2016
Effective date: N/A

Relevant industries: All
Relevant companies: All
Relevant taxes: N/A

Potential impacts on
businesses:

- Compliance costs reduced

You may click [here](#) to access full content of the circular.

'Five licenses into one' reform pushed forward

As mentioned in KPMG [China Tax Weekly Update \(Issue 19, May 2016\)](#), several measures to push forward business system reform have been identified in an executive meeting of the State Council held on 18 May 2016. In KPMG [China Tax Weekly Update \(Issue 26, July 2016\)](#), it also mentioned that the State Council, on 5 July 2016, issued Guo Ban Fa [2016] No. 53 to clarify certain issues regarding reform of 'five certificates into one, one license one code', including: (i) the 'Five licenses into one' reform will be officially implemented starting from 1 October 2016; (ii) the set up a mechanism for cross-level, cross-region, cross-authority information exchange and data sharing.

On 27 July 2016, a circular jointly issued by 5 ministries including the State Administration for Industry and Commerce (SAIC), the National Development and Reform Commission (NDRC), the Ministry of Human Resources and Social Security (MOHRSS), The National Bureau of Statistics (NBS), and the Legislative Affairs Office of the State Council. This further clarifies that the existing certificates and licenses being held by enterprises will still be valid up to 1 January 2018, when they shall be replaced by the new business license with the uniform social credit code and cease to be valid.

* 'Five licenses into one' policy means that the business license (issued in the past by the administration of industry and commerce), the tax registration (issued by the local and state tax offices), organization code (issued by quality supervision, inspection and quarantine offices), social insurance registration (issued by HR and social security offices) and statistics registration license (issued by statistics bureaus) are all certified at the same time. Under the new policy, an enterprise is only required to complete the business registration with local administration of industry and commerce and it then obtains a business license with a unified social credit code. There is no need for a new enterprise, having registered with the local administration of industry and commerce to approach, say, the local tax bureau to register for tax; this will have been done automatically with the local administration of industry and commerce registration.

Reference: N/A
 Issuance date: 2 August 2016
 Effective date: N/A

Relevant industries: Taxi industry
 Relevant companies: Didi Chuxing and Uber China
 Relevant taxes: N/A

Potential impacts on businesses:

- Risks of being challenged due to non-compliance issues increased

You may click [here](#) to access full content of the circular.

MOFCOM responds to Didi-Uber deal

On 1 August 2016, the Ministry of Commerce (MOFCOM) responded to the Didi Chuxing and Uber China deal on its official We-chat. The press spokesman of MOFCOM said that they have not received the declaration of concentration of undertakings regarding the merger of Didi Chuxing and Uber China.

- According to China's Anti-monopoly Law and Rules of the State Council on Declaration Threshold for Concentration of Undertakings, where a concentration reaches certain thresholds, a declaration must be lodged with MOFCOM in advance of implementation of the concentration. MOFCOM shall review the declared concentration and make a decision.
- Factors that shall be taken into account during MOFCOM's antitrust review include: (i). Market shares of the business operators involved in the concentration and their control over the market; (ii). Degree of market concentration of the relevant market; (iii). Impact of the concentration of business operators on market entry and technological advancement etc.
- Where a concentration reaches the declaration threshold but the concentration parties fail to declare, MOFCOM shall order the business operator to stop implementing the concentration, to dispose of the shares or assets within a stipulated period or to transfer the business within a stipulated period and to adopt other necessary measures to reinstate the pre-concentration status; a fine of not more than RMB500,000 may be imposed.

* According to the Rules of the State Council on the Declaration Threshold for Concentration of Undertakings, where a concentration reaches one of the following thresholds, a declaration must be lodged in advance with the competent commerce department under the State Council, or otherwise the concentration shall not be implemented:

- ❖ During the previous fiscal year, the total global turnover of all business operators participating in the concentration exceeded RMB10 billion, and at least two of these business operators each had a turnover of more than RMB400 million within China; or
- ❖ During the previous fiscal year, the total turnover within China of all the business operators participating in the concentration exceeded RMB2 billion, and at least two of these business operators each had a turnover of more than RMB400 million within China.

Where a concentration of undertakings does not reach the threshold of declaration specified in the above rules, but the facts and evidences collected in accordance with the prescribed procedures indicate that the concentration has or may have effect of eliminating or restricting competition, the competent commerce department under the State Council shall conduct investigations accordingly.

** Given the importance of this deal to the China digital economy, we will continue to update on progress with this deal.

Reference: N/A
 Issuance date: 1 August 2016
 Effective date: N/A

Relevant industries: All
 Relevant companies: All
 Relevant taxes: CIT / IIT

Potential impacts on businesses:

- Operational costs increased
- Risks of being challenged due to non-compliance issues increased

You may click [here](#) to access full content of the case.

A case of a China Service PE

On 1 August 2016, SAT published a case of a China Service Permanent Establishment (PE), given rise to by the activities of dispatched foreign staff in China, in its official We-chat update.

Background:

- A Chinese company ('Company A') has a parent company ('Company B') which is located in Country B. Company B dispatched employees from Country B to Company A in China to render labour services in relation to a number of Company A's projects between November 2009 and December 2014. These included projects to provide technical guidance, after-sale services, etc. The relevant foreign employees did not pay Individual Income Tax (IIT).

The local tax authority's (Beijing Local Tax Bureau) judgment was that:

- The foreign employees were determined to give rise to a China Services PE for Company B. This was because they provided services on the same project in China for periods aggregating more than 183 days. The employees, which are deemed to be connected with the asserted PE, shall be subject to IIT on their salary income. The dispatch of employees by Company B to China was determined to give rise to 19 PEs in total in China. As a result, Company B paid additional IIT of RMB 17.71 million and late payment penalty of RMB 5.5 million.

The basis for the tax authority's PE judgment were that:

- According to Article 5 of the tax treaty between China and Country B, the term "PE" includes: the furnishing of services, including consultancy services, by an enterprise through employees or other personnel engaged by the enterprise for such purpose, but only if such activities of that nature continue (for the same or a connected project) within a Contracting State for a period or periods aggregating more than 6 months within any twelve-month period.
- According to the interpretation for China-Singapore DTA (Guo Shui Fa [2016] No. 75), several projects engaged by the same enterprise which have business relations or connections shall be deemed as "the same project or connected projects". With regard to the provisions on provision of labour services consecutively or cumulatively for more than 183 days within a twelve-month period, in the actual calculation, the duration of stay shall be calculated based on the consecutive or accumulative period of stay of all the employees who provide labour services for the same item in China in different periods of time.
- When determining whether a non-resident enterprise has a PE in China, no matter how long its foreign employees are working in China and no matter where the employees' salaries are paid, tax authority shall deem that the employees' salaries for the period of working for the PE will be borne by the PE, and IIT accordingly imposed.

* From the limited available information of this case, it seems that the key challenge of the local tax authority is that different projects have business relations or connections shall be deemed as "the same project or connected projects", which is a pre-BEPS Service PE concept. To the extent that PE cases are of keen interest to foreign investors in China following the BEPS PE proposals and statements by senior SAT officials that they plan to ramp up PE enforcement, we will continue to report such cases as the SAT update on them.



Scientific research funding to be improved

On 31 July 2016, the General Office of the CPC Central Committee and the General Office of the State Council jointly issued the *Several Opinions on Further Improving the Administration for Funds of Central Financial Scientific Research Projects* ("The Opinions"), The Opinions put forward a series of easing measures in terms of the proportion of funds, expenditure range, set-up of budget accounts etc. This aims to arouse the and innovation and creativity of scientific research personnel.

You may click [here](#) to access full content of the circular.

Imported equipment VAT can be paid in instalments

On 1 June 2016, the Ministry of Finance (MOF), General Administration of Customs (GAC) and State Administration of Taxation jointly issued Cai Guan Shui [2016] No. 30 to clarify that import VAT shall be paid by instalment within continuous 72 months after importation of equipment for new-type display device project.

You may click [here](#) to access full content of the circular.

MOF and NDRC clarify real estate registration fees

On July 12 2016, The MOF and National Development and Reform Commission (NDRC) issued the Notice to clarify the real estate registration fees. According to the Notice, when Ministry of Land and Resources and local real estate authorities at county level and above process the initial registration, change registration, transfer registration, deregistration, correction registration, dissenting registration of real estate, they may charge registration fees with quota amount to applicants. Where small-scale enterprise with low-profits (including individual business) apply for real estate registration, they may be entitled to enjoy the exemption or reduction of registration fees.

You may click [here](#) to access full content of the circular.



Announcement on the imposition of anti-dumping duties for imports of acrylic fibers

On 13 July 2016, GAC issued Announcement [2016] No. 41 ("Announcement 41") to decide that the imported acrylic fibers (originally produced in Japan, South Korea and Turkey) shall be subject to anti-dumping duties for 5 years starting from 14 July 2016. Announcement 41 also attached investigation of relevant cases released by MOFCOM ([MOFCOM Announcement \[2016\] No. 31](#)), including the final ruling on the anti-dumping investigation against imports of acrylic fibers, collection methods of the anti-dumping duties etc.

* With regard to the preliminary ruling on the anti-dumping investigation against imports of acrylic fibers and electrical steel, you may click KPMG [China Tax Weekly Update \(Issue 13, April 2016\)](#) for more details.

** With regard to the final ruling on the anti-dumping investigation against imports of electrical steel originated in Japan, South Korea and the EU, you may click KPMG [China Tax Weekly Update \(Issue 29, August 2016\)](#) for more details.

*** With regard to the final ruling on the anti-dumping investigation against imports of unbleached sack paper originated in the U.S., the EU and Japan, you may click KPMG [China Tax Weekly Update \(Issue 14, April 2016\)](#) for more details.

You may click [here](#) to access full content of the circular.

BLTB issued list of tax administrative licensing

On 28 July 2016, Beijing Local Tax Bureau (BLTB) issued a list of tax administrative licensing ("the List"). The List clarifies the examination and approval authorities for application of delayed tax payment, delayed tax filing and change of tax payment in a lump-sum etc.

You may click [here](#) to access full content of the circular.

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