China Tax Alert

Issue 38, December 2016

Significant retrospective changes introduced to clarify VAT reform policies

Regulations discussed in this issue:

- Circular Caishui [2016] 140

Background

On 21 December 2016, China's Ministry of Finance (MOF) and State Administration of Taxation (SAT) jointly issued Circular Caishui [2016] 140 (Circular 140) which sets out new Value Added Tax (VAT) rules applicable to those sectors which recently transitioned from Business Tax (BT) to VAT, being financial services, real estate and construction services, and lifestyle services.

Given the absence of significant international precedent to call upon, it was inevitable that some of the rules initially set out in Circular Caishui [2016] 36 (Circular 36) would need to change once issues identified in practice emerged. The policymakers have responded with the release of Circular 140 before the end of the first fiscal year after the VAT reforms were implemented.

Circular 140 clarifies a number of uncertainties which have arisen in practice, and assists taxpayers by overcoming some of the previous inconsistencies in interpretation which have occurred between tax authorities at a local level.

Importantly, Circular 140 takes effect from 1 May 2016, meaning that its impact will affect all transactions from the inception of the VAT reforms. Though retrospectivity in tax rules is often considered undesirable, in this case the retrospective changes generally benefit taxpayers and therefore give them an opportunity to secure tax benefits they may not have recognized as yet. However to give effect to these changes retrospectively is discussed further below.

In the recently released Sixth edition of the "China Looking Ahead" series published by International Tax Review, KPMG writers noted a "tax authority willing to listen, adapt and make changes where needed in response to concerns", but equally noted that "the extent of clarity and certainty sought by taxpayers, and their advisers, may always be plotted on a graph that approaches infinity". Circular 140 is a perfect example of this. In the attempt to clarify the previous policies, new Circulars will be needed in the near future to clarify uncertainties creates with Circular 140.

The release of Circular 140 will no doubt be warmly welcomed by taxpayers, though in this China Alert we highlight certain areas where further clarification or uncertainties may still exist. We discuss the new rules and provide our observations in terms of their impact on each industry segment separately, though strictly speaking, any industry group may be impacted by these new rules where they engage in transactions which fall within the scope of these rules.

KPMG commentary on new rules and key impacts

Financial services

We first provide some brief observations below on the impact of Circular 140 on the financial services sector.

Income derived from principal protected or non-principal protected products

According to Circular 36, the income derived from holding financial products, whether it is in the form of a return on principal protected products, remuneration, fees for the use of funds, or other forms of compensation, is subject to VAT at the rate of 6 percent as a loan service.

Circular 140 now effectively creates a distinction between returns on principal protected products (subject to VAT at 6 percent), and returns from holding non-principal protected products (not subject to VAT).

"Returns on principal protected products, remuneration, fees for the use of funds, and compensation" is the investment income which is explicitly stated in the contract, and where the principal will be fully recovered upon maturity.

In essence, what Circular 140 seeks to do is to clarify the difference between returns on debt, and returns on non-debt instruments. Circular 140 does this by prescribing that what distinguishes debt in the form of a loan (as compared with other instruments) is the existence of an effectively non-contingent obligation to repay the principal upon maturity.

However, Circular 140 does not give clear guidance as to how to make that determination. For example, whether the focus will be on the legal form – that is, whether the contract has to include specific wording such as "principal guaranteed"; or whether the VAT treatment will be influenced by the accounting treatment; or more generally, whether a "substance over form" principle will be adopted by the tax authority to evaluate the nature of such income. This could possibly lead to different approaches between tax authorities and taxpayers.

Financial products - "held to maturity"

Circular 36 provides that net gains from trading in financial products is subject to VAT at the rate of 6 percent.

“Trading of financial products” comprises the transfer of ownership of foreign exchange securities, non-commodity futures and “other financial products”. “Other financial products” refer to various types of asset management products such as funds, trusts, wealth management products, as well as various types of derivatives.

Before the release of Circular 140, it was unclear whether the purchase and holding of financial products until maturity fell within the scope of “trading of financial products”. The explanation provided by the tax authorities at a local level varied city from city. However, Circular 140 seeks to clarify that if a taxpayer holds asset management products (such as funds, trusts, wealth management products) until maturity, the relevant income does not fall within the scope of financial products trading. Instead, such income would be subject to VAT at the rate of 6 percent as loan services if it is principal protected, or not subject to VAT if it is considered as non-principal protected.

In practice, certain asset management products do not have a specific maturity date, or the holding period will last for several decades. In this situation, if a taxpayer transfers a financial product without a specific maturity date or before the maturity date, such a transaction is likely to be considered as the trading of financial products and subject to VAT accordingly.

Extending the scope of taxpayers eligible for bad debt relief for interest income

China’s VAT system contains a limited form of bad debt relief applicable to non-performing loans. In essence, where a period of 90 days or more has expired from when interest was receivable but not received, the lender is not required to continue accounting for output VAT unless and until such time as the interest is actually paid. However, the output VAT applicable to interest which is receivable but not received during the initial 90 day period, cannot be reversed.

According to Circular 36, the only taxpayers eligible to apply this limited form of bad debt relief is “financial enterprises”, which is defined as banks (including State-owned, collective, shareholding structure, equity joint venture, foreign-funded banks and banks with other ownership structures), urban credit cooperatives, rural credit cooperatives, trust investment companies and finance companies.

Circular 140 now extends this scope of eligible taxpayers so as to include securities companies, insurance companies, financial leasing companies, securities funds management companies, securities investment funds and also other entities which are established with approval either by the People’s bank of China (PBOC), China Bank Regulatory Commission (CBRC), China Securities Regulatory Commission (CSRC) or China Insurance Regulatory Commission (CIRC) to engage in finance and insurance business. As such, other financial enterprises such as automobile finance companies will be able to benefit from this same concession. This will lead to a more level playing field for all financiers offering similar services.

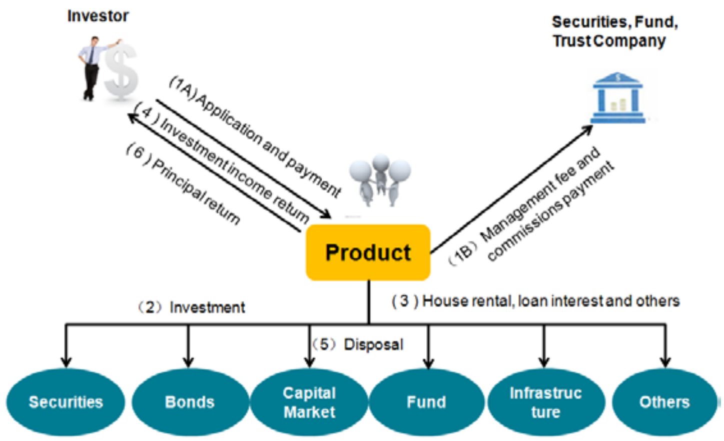
Having said that, certain taxpayers such as finance leasing companies approved by the Ministry of Commerce and micro credit companies still are not able to enjoy such preferential treatment since they are not regulated by the PBOC, CBRC, CSRC or CIRC.

Asset management products – who is the VAT taxpayer

Internationally, the VAT treatment of asset management products, as well as trusts and funds, varies significantly. In many jurisdictions, the issue can be of relatively minor importance only because the trading of such products, or the returns from the assets which are invested in, are often exempted from VAT. In other jurisdictions, the obligations to account for VAT are imposed variously at the investor level, the fund level or the trust level.

In China, these issues taken on heightened significance because most financial products and assets are generally taxed for VAT purposes, and the registration thresholds and compliance burdens can produce significantly different outcomes if imposed at the product, fund or trust level, as compared with being imposed at the investor level.

The following diagram serves as a useful guide to highlight many of the flows which can take place in a typical fund or trust structure. Each of those flows potentially give rise to VAT issues which need to be carefully considered.



As mentioned in our previous China Alerts on Circular 36, the growth of trusts, funds and other asset management products in China has outpaced regulation in many respects. A common question is who is responsible for registering for VAT, accounting for VAT, and the issuance or receipt of VAT invoices. For convenience, we use the term "asset manager" and "asset management products" only, though in reality this treatment applies equally in a trust context and in a fund context. Theoretically, there were 3 different models which the regulators could have chosen from. They could have required:

- The asset manager to account for VAT (albeit on a consolidated basis) for all of the products which they manage;
- The asset manager to account for VAT separately on a specific product basis for each of the products they manage; or
- The investor could have been required to account for the VAT (i.e. look through treatment).

As we had expected, Circular 140 clarifies that the asset manager shall be the VAT taxpayer. It shall account for VAT on a consolidated basis in respect of all of the taxable activities occurring during the operating period of the asset management products. This means the asset manager will not be required to register and account for VAT separately in respect of each asset management product, and neither will the individual investor. We expect that Circular 140 merely clarifies what some asset managers are already likely to have done in practice, while for other asset managers which have operated on the basis of the investors accounting for any VAT, Circular 140 will represent a significant change.

While the VAT position as between the asset manager and the tax authorities may have been clarified to some extent in Circular 140, the asset management company will still need to keep separate (internal) accounting records for each product and calculate the VAT applicable to each product respectively. Otherwise, the interests and liabilities of different investors in different products will be affected by comingling. For example, where investors in one product have a net VAT credit balance, and the investors in another product have a VAT output liability, it may need to be unmingled so as to avoid one set of investors effectively ‘funding’ another.

Despite the release of Circular 140, there are still many practical issues in the asset management sector where further clarification is needed. Issues include:

- In the case of an asset manager managing hundreds of products, how it can reflect the output tax / input tax for each product in one VAT filing return?
- What is the VAT impact of the asset management fees charged by the asset manager? Can it do self-invoicing for the management fee charged to the products, and for professional or sophisticated investors, would they be eligible for an input VAT credit for the handling fee charged?
- Who accounts for VAT in relation to dealings between investors – for example, when one investor sells their investment to another – is it the investor or the asset manager?
- What happens where the asset manager is an offshore entity, yet is dealing with PRC investors and/or holding PRC assets?
- Whether the investor will be required to pay VAT, if subject to VAT, for the returns it receives from the asset manager?

Overall, this new rule will have a significant impact on asset managers, including but not limited to, increasing the liabilities and compliance costs of asset managers. The asset manager will also need to review and modify its legal documents to accommodate these new rules. The policy makers will also need to give further guidance on these matters.

Losses incurred from trading in financial products

Circular 36 provides that losses from trading in financial products can only be carried forward to offset gains from trading in financial products within the same calendar year. This was potentially problematic during 2016 given that the VAT system only commenced part way through the year on 1 May 2016.

Circular 140 now allows losses from trading in financial products incurred in the period from January to April 2016 to be carried forward to the next filing period. This means the accrued losses incurred under the BT regime can be used to offset any gains from trading in financial products derived under the VAT regime for the period from May to December 2016.

While this is good news for taxpayers able to utilize losses incurred from financial products trading in the first four months of 2016, Circular 140 does not allow taxpayers to carry back losses incurred in May to December 2016 to offset gains derived under the BT regime.

Finance leasing companies

Circular 36 provides that qualified finance leasing companies are able to enjoy certain preferential VAT policies, such as the ability to use the net basis method for calculating their VAT liabilities.

Circular 140 extends the scope of qualified finance leasing companies mentioned in Circular 36 so as to include not only those finance leasing companies approved by the PBOC, CBRC or Ministry of Commerce (MOFCOM), Bureau of Commerce and National Economic and Technology Development Zones, but also those who have completed record filing with the government authorities mentioned above.

Real estate and construction services

Expanding the scope of deduction for obtaining land use rights

The real estate and construction industry is amongst the most economically sensitive sectors affected by VAT reforms. As the VAT rates for the real estate and construction industry (11 percent) are substantially higher than the previous BT rates (5 percent), the government has been very careful to ensure that the tax burden impact associated with the transition from BT to VAT is managed appropriately and has introduced several specific rules to achieve that objective, including allowing a 'deemed input VAT credit' or deduction for purchases of land use rights against the sale proceeds.

More specifically, Circular 36 provides that when developers sell real estate, they are eligible to deduct from the sale proceeds the purchase price of land use rights from the local government authority in calculating their VAT liability. However, this does not apply where the simplified VAT method has been used.

The clear purpose of the concession in Circular 36 was to ensure that developers would effectively be pay VAT on their "margin" only, either because they could claim an input VAT credit for expenses they incur in the development (where those expenses were subject to VAT), or by claiming a deduction of the land use rights (which was not subject to VAT).

However, many developers were still left with a category of black hole expenditure – that is, expenses for which no deduction or input VAT credit would be available, but which economically reduced their margin. In practice, developers could not obtain special VAT invoices for resettlement compensation, initial land development costs and land assignment returns. These costs are often significant.

Circular 140 expands the scope of the deduction for "the purchase price of land use rights", so as to include many of the above costs. The expanded scope includes:

- Land acquisition costs paid to the government;
- Resettlement compensation paid to the government, other individuals or entities when purchasing the land use rights. Supporting documents which are used to prove the authenticity of such compensation amounts is needed, which includes but is not limited to: resettlement agreement, the payment/ receipt voucher of the resettlement compensation;
- Initial land development costs paid to the government; and
- The purchase price of land use rights paid to the government.

This change will be warmly welcomed by real estate developers. Many will no doubt wish to take advantage of these changes on a retrospective basis, which is discussed further below.

Project Company could deduct purchase price of land use rights which is settled by developers

In practice, after a developer obtains the land use rights, it will typically set up a separate project company to develop the land. One question which had arisen was whether the project company could claim the deduction for the purchase of the land use rights, even though it was settled by a different legal entity. Circular 140 resolves the issue by clarifying that if all of the following conditions are satisfied, the purchase price of the land use rights which is settled by the developer can be deducted by the project company:

- The project company must be appointed as the land assignee under a tripartite agreement which should be concluded between the developer, the project company and government authority;
- The purchase price of the land use rights should not be changed when concluding the tripartite agreement, if the purpose and the development plan is unchanged;
- The project company must be 100% owned by the developer.

It should be noted that, in practice, after the set-up of the project company, the original developer may introduce other developers to invest in the project company. Whether this can be achieved in a two step process (that is, by initially meeting the 100% ownership requirement before introducing other developers) yet still meet the criteria of Circular 140, remains to be seen.

Clarification of the category of certain services

Circular 140 also seeks to categorize certain services as falling within the scope of "construction services" which is subject to 11 percent VAT. They are:

- Decoration services provided by a property management company to the owner falls within the scope of construction services; and
- If taxpayers rent construction equipment and also provide operating personnel, the services provided falls within the scope of construction services.

In practice, some property management companies have treated the decoration services provided as property management services which is subject to 6 percent VAT. However, Circular 140 effectively clarifies that the VAT treatment is determined by reference to the nature of the service (i.e. a construction service) rather than the taxpayer's main business (i.e. property management). Decoration services provided to tenants should also follow the above VAT treatment.

Lifestyle services

Clear classification of certain lifestyle services

Circular 36 provides that lifestyle services are subject to 6 percent VAT. However, in practice one of the issues, especially with restaurants and hotels, is how to distinguish these services from other services subject to VAT at different rates (e.g. 11 percent for real estate services), or from the sale of goods (17 percent VAT).

In order to guide taxpayers to calculate and pay VAT under the correct service categories and solve certain tax collection and management issues, Circular 140 classifies the following services:

- If taxpayers are mainly engaged in food and beverage (F&B) services, then their sales of take-away or delivery services fall into the scope of "F&B services". That is, the applicable VAT rate shall be 6 percent instead of 17 percent VAT applicable to sales of goods.
- The provision of meeting venues and relevant support services by hotels, hostels, holiday resorts and other for-profit accommodations services providers fall into the scope of "conference and exhibition services" which is subject to 6 percent VAT;
- If taxpayers operate cableway, ferry cars, battery cars and cruises in tourist sites, they should pay VAT under "cultural and sports services" (which is subject to 6 percent VAT instead of 11% VAT for transportation);
- The provision of armed guard and escort services should be subject to "security and protection services", which is subject to 6 percent VAT.

Before the issuance of Circular 140, there was substantial uncertainty about the applicable VAT rate for take-away and home delivery services, as being 17 percent or 6 percent. Interestingly, the approach adopted in Circular 140 is to categorise based on the restaurant's "predominant business", rather than based on the specific activity being carried out – this represents a departure from the normal VAT rules in Circular 36.

While this clarification will be warmly welcomed by taxpayers affected by this, from a policy perspective there is a concern that this results in inequitable treatment for those businesses predominantly engaged in take-away or home delivery services, where 17 percent VAT would apply. Competition in this industry is fierce, and margins may not allow for such a significant variation in VAT rates.

In reality, it can be difficult for restaurants to distinguish take-away foods from restaurant meals, and it may also be difficult for the tax authorities to supervise or enforce this. Ultimately, it would be desirable from a longer-term policy perspective if this distinction between VAT rates for sales of food products from F&B services was removed altogether.

Grant of simplified method for certain taxpayers

Circular 140 also introduces a new rule allowing general VAT taxpayers the choice to apply a simplified 3% VAT rate method for the provision of educational support services. If an education provider is also providing exempt education services, the adoption of this method effectively means there is no need to apportion input VAT credits – put simply, all input VAT credits would be denied.

Circular 140 also allows non-enterprise organizations, such as universities and other academic organisations, which are general VAT taxpayers the choice to apply a simplified 3% VAT rate method for the provision of the following services or sales of following intangible assets:

- R&D and technical services;
- Information technology services;
- Authentication and consultation services;
- Sales of technology;
- Sales of copyright;
- Technology transfer, technology development and the related technical consulting and technical services stipulated in Appendix 3 of Circular 36.

Other rules

New policies for upstream enterprises in oil industry

From 1 January 2017, upstream enterprises in the oil industry which sell ocean engineering structures or enter into finance leases of either ocean engineering structures, will no longer be entitled to VAT export refund policies. If the purchaser or the lessee is a Chinese-foreign co-operative oil field company and the VAT is collected in kind, the above regulation will not apply. The aim of this policy is to maintain the integrity of the deduction chain of VAT since most oil operators are now subject to 17% VAT under the normal VAT regime.

Circular 140 also provides grandfathering relief for these upstream enterprises. For contracts concluded before 1 January 2017, these upstream enterprises can still enjoy the VAT export refund policy until the contract expiry date.

Retrospective impact

Except where specifically noted above, Circular 140 is retrospective to 1 May 2016. This raises the question of how to give effect to this retrospectivity. Generally, most of the changes in Circular 140 are beneficial to taxpayers, so it will be incumbent upon them to seek to adjust their VAT position to give effect to these changes. Circular 140 provides that if a taxpayer has overpaid VAT in a prior period, it will be able to use the overpaid VAT to offset the VAT payable in the future.

However, in practice we anticipate a number of challenges arising in implementing these changes retrospectively. By way of example:

- Certain asset managers may not have accounted for the VAT on their asset management products, but if the investors have accounted for the VAT then should the position be unwound?
- Alternatively, if the asset manager has not accounted for the VAT but has made distributions to the investors which are calculated on the assumption that they would account for the VAT, will those asset managers be exposed for an unforeseen liability?
- Where beneficial rule changes have been made, such as for real estate developers, will there be any flexibility in respect of documentation or evidentiary requirements to claim deductions, especially where those developers were unaware of the need to obtain those documents at the time.
- What will be the timeframe by which taxpayers must take advantage of these changes on an historical basis?

Conclusion

While these changes are generally beneficial to taxpayers, it is quite clear that significant work will need to be performed to implement these changes from an administrative, compliance, and record-keeping perspective, especially on a retrospective basis. Please consult with your regular KPMG advisor for assistance.

Contact Us

For any enquiries, please send to our public mailbox: taxenquiry@kpmg.com or contact our partners/directors in each China/HK offices.

Khoonming Ho
Head of Tax,
KPMG China
Tel. +86 (10) 8508 7082
khoonming.ho@kpmg.com

Beijing/Shenyang
David Ling
Tel. +86 (10) 8508 7083
david.ling@kpmg.com

Tianjin
Eric Zhou
Tel. +86 (10) 8508 7610
ec.zhou@kpmg.com

Qingdao
Vincent Pang
Tel. +86 (532) 8907 1728
vincent.pang@kpmg.com

Shanghai/Nanjing
Lewis Lu
Tel. +86 (21) 2212 3421
lewis.lu@kpmg.com

Chengdu
Anthony Chau
Tel. +86 (28) 8673 3916
anthony.chau@kpmg.com

Hangzhou
John Wang
Tel. +86 (571) 2803 8088
john.wang@kpmg.com

Guangzhou
Lilly Li
Tel. +86 (20) 3813 8999
lilly.li@kpmg.com

Fuzhou/Xiamen
Maria Mei
Tel. +86 (592) 2150 807
maria.mei@kpmg.com

Shenzhen
Eileen Sun
Tel. +86 (755) 2547 1188
eileen.gh.sun@kpmg.com

Hong Kong
Karmen Yeung
Tel. +852 2143 8753
karmen.yeung@kpmg.com

Northern China

David Ling
Head of Tax,
Northern Region
Tel. +86 (10) 8508 7083
david.ling@kpmg.com

Andy Chen
Tel. +86 (10) 8508 7025
andy.m.chen@kpmg.com

Yali Chen
Tel. +86 (10) 8508 7571
yali.chen@kpmg.com

Conrad TURLEY
Tel. +86 (10) 8508 7513
conrad.turley@kpmg.com

Milano Fang
Tel. +86 (532) 8907 1724
milano.fang@kpmg.com

Tony Feng
Tel. +86 (10) 8508 7531
tony.feng@kpmg.com

John Gu
Tel. +86 (10) 8508 7095
john.gu@kpmg.com

Rachel Guan
Tel. +86 (10) 8508 7613
rachel.guan@kpmg.com

Helen Han
Tel. +86 (10) 8508 7627
h.han@kpmg.com

Michael Wong
Tel. +86 (10) 8508 7085
michael.wong@kpmg.com

Josephine Jiang
Tel. +86 (10) 8508 7511
josephine.jiang@kpmg.com

Henry Kim
Tel. +86 (10) 8508 5000
henry.kim@kpmg.com

Li Li
Tel. +86 (10) 8508 7537
li.li@kpmg.com

Lisa Li
Tel. +86 (10) 8508 7638
lisa.h.li@kpmg.com

Thomas Li
Tel. +86 (10) 8508 7574
thomas.li@kpmg.com

Simon Liu
Tel. +86 (10) 8508 7565
simon.liu@kpmg.com

Alan O'Connor
Tel. +86 (10) 8508 7521
alan.oconnor@kpmg.com

Vincent Pang
Tel. +86 (10) 8508 7516
+86 (532) 8907 1728
vincent.pang@kpmg.com

Naoko Hirasawa
Tel. +86 (10) 8508 7054
naoko.hirasawa@kpmg.com

Shirley Shen
Tel. +86 (10) 8508 7586
yinghua.shen@kpmg.com

Joseph Tam
Tel. +86 (10) 8508 7605
laiyiu.tam@kpmg.com

Joyce Tan
Tel. +86 (10) 8508 7666
joyce.tan@kpmg.com

Jessica Xie
Tel. +86 (10) 8508 7540
jessica.xie@kpmg.com

Christopher Xing
Tel. +86 (10) 8508 7072
christopher.xing@kpmg.com

Irene Yan
Tel. +86 (10) 8508 7508
irene.yan@kpmg.com

Jessie Zhang
Tel. +86 (10) 8508 7625
jessie.j.zhang@kpmg.com

Sheila Zhang
Tel: +86 (10) 8508 7507
sheila.zhang@kpmg.com

Tiansheng Zhang
Tel. +86 (10) 8508 7526
tiansheng.zhang@kpmg.com

Tracy Zhang
Tel. +86 (10) 8508 7509
tracy.h.zhang@kpmg.com

Eric Zhou
Tel. +86 (10) 8508 7610
ec.zhou@kpmg.com

Central China

Lewis Lu
Head of Tax,
Eastern & Western Region
Tel. +86 (21) 2212 3421
lewis.lu@kpmg.com

Alan Garcia
Tel. +86 (21) 2212 3509
alan.garcia@kpmg.com

Cheng Chi
Tel. +86 (21) 2212 3433
cheng.chi@kpmg.com

Yasuhiko Otani
Tel. +86 (21) 2212 3360
yasuhiko.otani@kpmg.com

Johnny Deng
Tel. +86 (21) 2212 3457
johnny.deng@kpmg.com

Cheng Dong
Tel. +86 (21) 2212 3410
cheng.dong@kpmg.com

Marianne Dong
Tel. +86 (21) 2212 3436
marianne.dong@kpmg.com

Chris Ge
Tel. +86 (21) 2212 3083
chris.ge@kpmg.com

Chris Ho
Tel. +86 (21) 2212 3406
chris.ho@kpmg.com

Henry Wong
Tel. +86 (21) 2212 3380
henry.wong@kpmg.com

Jason Jiang
Tel. +86 (21) 2212 3527
jason.jt.jiang@kpmg.com

Flame Jin
Tel. +86 (21) 2212 3420
flame.jin@kpmg.com

Sunny Leung
Tel. +86 (21) 2212 3488
sunny.leung@kpmg.com

Michael Li
Tel. +86 (21) 2212 3463
michael.y.li@kpmg.com

Karen Lin
Tel. +86 (21) 2212 4169
karen.w.lin@kpmg.com

Christopher Mak
Tel. +86 (21) 2212 3409
christopher.mak@kpmg.com

Henry Ngai
Tel. +86 (21) 2212 3411
henry.ngai@kpmg.com

Ruqiang Pan
Tel. +86 (21) 2212 3118
ruqiang.pan@kpmg.com

Amy Rao
Tel. +86 (21) 2212 3208
amy.rao@kpmg.com

Wayne Tan
Tel. +86 (28) 8673 3915
wayne.tan@kpmg.com

Tanya Tang
Tel. +86 (25) 8691 2850
tanya.tang@kpmg.com

Rachel Tao
Tel. +86 (21) 2212 3473
rachel.tao@kpmg.com

Janet Wang
Tel. +86 (21) 2212 3302
janet.z.wang@kpmg.com

John Wang
Tel. +86 (21) 2212 3438
john.wang@kpmg.com

Mimi Wang
Tel. +86 (21) 2212 3250
mimi.wang@kpmg.com

Jennifer Weng
Tel. +86 (21) 2212 3431
jennifer.weng@kpmg.com

Grace Xie
Tel. +86 (21) 2212 3422
grace.xie@kpmg.com

Bruce Xu
Tel. +86 (21) 2212 3396
bruce.xu@kpmg.com

Jie Xu
Tel. +86 (21) 2212 3678
jie.xu@kpmg.com

Robert Xu
Tel. +86 (21) 2212 3124
robert.xu@kpmg.com

Yang Yang
Tel. +86 (21) 2212 3372
yang.yang@kpmg.com

William Zhang
Tel. +86 (21) 2212 3415
william.zhang@kpmg.com

Dylan Jeng
Tel. +86 (21) 2212 3080
dylan.jeng@kpmg.com

Hanson Zhou
Tel. +86 (21) 2212 3318
hanson.zhou@kpmg.com

Anthony Chau
Tel. +86 (21) 2212 3206
anthony.chau@kpmg.com

Michelle Zhou
Tel. +86 (21) 2212 3458
michelle.b.zhou@kpmg.com

Southern China

Lilly Li
Head of Tax,
Southern Region
Tel. +86 (20) 3813 8999
lilly.li@kpmg.com

Penny Chen
Tel. +1 (408) 367 6086
penny.chen@kpmg.com

Vivian Chen
Tel. +86 (755) 2547 1198
vivian.w.chen@kpmg.com

Sam Fan
Tel. +86 (755) 2547 1071
sam.kh.fan@kpmg.com

Joe Fu
Tel. +86 (755) 2547 1138
joe.fu@kpmg.com

Ricky Gu
Tel. +86 (20) 3813 8620
ricky.gu@kpmg.com

Fiona He
Tel. +86 (20) 3813 8623
fiona.he@kpmg.com

Angie Ho
Tel. +86 (755) 2547 1276
angie.ho@kpmg.com

Aileen Jiang
Tel. +86 (755) 2547 1163
aileen.jiang@kpmg.com

Cloris Li
Tel. +86 (20) 3813 8829
cloris.li@kpmg.com

Jean Li
Tel. +86 (755) 2547 1128
jean.j.li@kpmg.com

Sisi Li
Tel. +86 (20) 3813 8887
sisi.li@kpmg.com

Mabel Li
Tel. +86 (755) 2547 1164
mabel.li@kpmg.com

Kelly Liao
Tel. +86 (20) 3813 8668
kelly.liao@kpmg.com

Patrick Lu
Tel. +86 (755) 2547 1187
patrick.c.lu@kpmg.com

Grace Luo
Tel. +86 (20) 3813 8609
grace.luo@kpmg.com

Maria Mei
Tel. +86 (592) 2150 807
maria.mei@kpmg.com

Eileen Sun
Tel. +86 (755) 2547 1188
eileen.gh.sun@kpmg.com

Michelle Sun
Tel. +86 (20) 3813 8615
michelle.sun@kpmg.com

Bin Yang
Tel. +86 (20) 3813 8605
bin.yang@kpmg.com

Lixin Zeng
Tel. +86 (20) 3813 8812
lixin.zeng@kpmg.com

Hong Kong

Ayesha M. Lau
Head of Tax, Hong Kong
Tel. +852 2826 7165
ayesha.lau@kpmg.com

Chris Abbiss
Tel. +852 2826 7226
chris.abbiss@kpmg.com

Darren Bowdern
Tel. +852 2826 7166
darren.bowdern@kpmg.com

Yvette Chan
Tel. +852 2847 5108
yvette.chan@kpmg.com

Lu Chen
Tel. +852 2143 8777
lu.l.chen@kpmg.com

Rebecca Chin
Tel. +852 2978 8987
rebecca.chin@kpmg.com

Wade Wagatsuma
Tel. +852 2685 7806
wade.wagatsuma@kpmg.com

Natalie To
Tel. +852 2143 8509
natalie.to@kpmg.com

Matthew Fenwick
Tel. +852 2143 8761
matthew.fenwick@kpmg.com

Sandy Fung
Tel. +852 2143 8821
sandy.fung@kpmg.com

Charles Kinsley
Tel. +852 2826 8070
charles.kinsley@kpmg.com

Stanley Ho
Tel. +852 2826 7296
stanley.ho@kpmg.com

Becky Wong
Tel. +852 2978 8271
becky.wong@kpmg.com

Barbara Forrest
Tel. +852 2978 8941
barbara.forrest@kpmg.com

John Kondos
Tel. +852 2685 7457
john.kondos@kpmg.com

Kate Lai
Tel. +852 2978 8942
kate.lai@kpmg.com

Travis Lee
Tel. +852 2143 8524
travis.lee@kpmg.com

Irene Lee
Tel. +852 2685 7372
irene.lee@kpmg.com

Alice Leung
Tel. +852 2143 8711
alice.leung@kpmg.com

Jocelyn Lam
Tel. +852 2685 7605
jocelyn.lam@kpmg.com

Ivor Morris
Tel. +852 2847 5092
ivor.morris@kpmg.com

Benjamin Pong
Tel. +852 2143 8525
benjamin.pong@kpmg.com

Malcolm Prebble
Tel. +852 2684 7472
malcolm.j.prebble@kpmg.com

David Siew
Tel. +852 2143 8785
david.siew@kpmg.com

Murray Sarelius
Tel. +852 3927 5671
murray.sarelius@kpmg.com

John Timpany
Tel. +852 2143 8790
john.timpany@kpmg.com

Lachlan Wolfers
Tel. +852 2685 7791
lachlan.wolfers@kpmg.com

Steve Man
Tel. +852 2978 8976
steve.man@kpmg.com

Curtis Ng
Tel. +852 2143 8709
curtis.ng@kpmg.com

Daniel Hui
Tel. +852 2685 7815
daniel.hui@kpmg.com

Karmen Yeung
Tel. +852 2143 8753
karmen.yeung@kpmg.com

Erica Chan
Tel. +852 3927 5572
erica.chan@kpmg.com

Adam Zhong
Tel. +852 2685 7559
adam.zhong@kpmg.com

kpmg.com/cn