

China Tax Weekly Update

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Reference: N/A Issuance date: N/A Effective date: N/A

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

Potential impacts on businesses:

- Effective tax burden reduced
- Compliance costs
 reduced
- Operational costs reduced
- Investment constraints
 reduced

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Report on the Work of the Government (2016) - Tax related topics

As mentioned in our <u>China Tax Weekly Update (Issue 8, March 2016)</u>, on 5 March 2016, Premier Li Keqiang of the State Council announced in *the Report on the Work of the Government* at the opening of the National People's Congress (NPC) that VAT reform will be fully implemented in 2016. The construction, real estate, financial and lifestyle service industries will all be subject to VAT with effect from 1 May 2016. The VAT incurred for purchase of new immovable properties will be included into the scope of creditable input VAT for all enterprises at the same time, to ensure that the effective tax burden of all industries is reduced.

On the occurrence of the policy announcement, KPMG immediately issued a newsletter, <u>KPMG's response to China's tax reform initiatives</u>, to explain the key impacts on multinational businesses.

To set out detailed analysis of the impact of the final full implementation of the VAT reforms, and key issues for the relevant industries, KPMG also immediately issued a <u>China Tax Alert: China's Value Added Tax expanded to</u> <u>fully replace Business Tax in major new announcement (Issue 7, March 2016)</u>. The announcement by Premier Li precedes the release of detailed implementation rules, which are expected imminently. Upon their release, KPMG will be issuing a further China Tax Alert.

As for other tax related contents of the *Report on the Work of the Government*, further excerpts are as follows:

Speed up finance and tax mechanism reform	• Work toward ensuring that the central and local governments receive an appropriate share of VAT revenue. Taxes suitable as sources of local government revenue will be handed over to local governments along with the corresponding administrative powers
	• Extend the resource tax reform of changing from a quantity-based to price-based tax levy
	 Promote the law-based administration of tax collection

 Continue to cancel the requirement of government review and approval for more matters. Focus on addressing unsynchronized, uncoordinated and incomplete delegation of powers Deepen reform of the business license system. Launch trials to separate operating permits and business licenses Release the lists of all powers and responsibilities of local governments Begin piloting a negative list for market access in some regions Develop new ways of conducting oversight model drawing on random inspections by randomly selected law enforcement officers or inspectors and requiring the promyt release of results Implement the reform for coordinated administrative law enforcement Adopt a unified approach to gathering information on enterprise credit rating. Release such information in accordance with the law, ensure joint punitive actuals to support for high and new technology enterprises (HNTEs) and science and high-tech development (R&D) expenses. Increase tax policy support for high and new technology business incubators Move faster to achieve nationwide implementation of the policy of national innovation demonstration zones. Establish pilot reform zones for all-round innovation supparts of options and high-tech development zones to establish pilot reform zones for all-round innovations Policies and measures will be implemented to support the transfer and port tax rebate rates. Ensure rebates are paid promptly and in full, and crack down on fraudulent claims Expand trials in cross-border e-commerce, and support therbrises for stocks and portions. Promote the development of enterprises in developing out to ack down on fraudulent claims Expand trials in cross-border e-commerce, and support neterprises in developing out for sign trade services. Launch trials to create innovative of developing trade in services. An add model clities of outsources are avices of trade services. 		
 whole country's potential for starting businesses and making innovations Move faster to achieve nationwide implementation of the policy of national innovation demonstration zones. Establish another set of national innovation demonstration zones to establish pilot reform zones for all-round innovation Policies and measures will be implemented to support the transfer and commercialization of scientific and technological results. Tax incentives for stocks and options, and profit sharing and bonus plans will be improved to encourage researchers to start businesses and make innovations Improve the structure of export tax rebate rates. Ensure rebates are paid promptly and in full, and crack down on fraudulent claims Expand trials in cross-border e-commerce, and support enterprises in developing overseas warehouses for export products. Promote the development of enterprises that provide comprehensive foreign trade services 	to streamline administration, delegate more powers, improve regulation, and provide better	 review and approval for more matters. Focus on addressing unsynchronized, uncoordinated and incomplete delegation of powers Deepen reform of the business license system. Launch trials to separate operating permits and business licenses Release the lists of all powers and responsibilities of local governments Begin piloting a negative list for market access in some regions Develop new ways of conducting oversight over the whole process of business operations. Introduce across the board an oversight model drawing on random inspections by randomly selected law enforcement officers or inspectors and requiring the prompt release of results Implement the reform for coordinated administrative law enforcement. Adopt a unified approach to gathering information on enterprise credit rating. Release such information in accordance with the law, ensure joint punitive action is taken where
 innovative development of foreign trade Ensure rebates are paid promptly and in full, and crack down on fraudulent claims Expand trials in cross-border e-commerce, and support enterprises in developing overseas warehouses for export products. Promote the development of enterprises that provide comprehensive foreign trade services Launch trials to create innovative ways of developing trade in services, and add model cities of outsource services. Accelerate the development of foreign 	whole country's potential for starting businesses and making	 development (R&D) expenses. Increase tax policy support for high and new technology enterprises (HNTEs) and science and technology business incubators Move faster to achieve nationwide implementation of the policy of national innovation demonstration zones. Establish another set of national innovation demonstration zones and high-tech development zones to establish pilot reform zones for all-round innovation Policies and measures will be implemented to support the transfer and commercialization of scientific and technological results. Tax incentives for stocks and options, and profit sharing and bonus plans will be improved to encourage researchers to
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 Further integrate and improve special customs regulation zones. Encourage processing trade to move to the central and western regions and extend to the medium-high end of the industrial chain Fully implement the single window system for international trade nationwide. Reduce the frequency of inspections for exports Increase the import of advanced technology and equipment, key spare parts and components, and energy and raw materials in short supply in China
 Continue to relax market access restrictions on investment, and further open the service sector and the general manufacturing sector. Simplify procedures for establishing foreign invested enterprises, and step up efforts to attract more investment Create new models of opening up for inland and border areas, and develop new overseas-oriented industrial clusters. Encourage more foreign
 Pilot free trade zones will be established in more parts of the country
 Improve the systems and mechanisms for governing development zones
 Significantly relax restrictions on entry into markets such as electricity, telecommunications, transport, petroleum, natural gas, and municipal public utilities. Remove hidden barriers, and encourage private companies to increase investment in these areas and participate in state-owned enterprise (SOE) reform. In these fields, private companies will enjoy the same treatment afforded to SOEs in terms of project verification and approval, financing, fiscal and tax policies, and land availability
 Decrease import tariffs on some consumer goods and increase the number of duty-free stores
 Improve the tax and credit policies for supporting justified personal housing consumption
• Improve and implement related supporting fiscal, tax, and financial policies to establish an RMB overseas cooperation fund. Make good use of bilateral industrial-capacity cooperation funds
• Actively negotiate and sign the Regional Comprehensive Economic Partnership agreement. Speed up negotiations on the establishment of the China-Japan-ROK free trade zone. Make progress in negotiations on investment agreements between China and the United States and between China and the European Union. Help strengthen collective strategic research on the Free Trade Area of the Asia-Pacific

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

Potential impacts on businesses:

• Effective tax burden reduced

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Ministry of Finance (MOF): Minister of the MOF answers questions on financial and tax reform

Based on a recent news published on the official website of China's central government, press center of the NPC and the Chinese People's Political Consultative Conference (CPPCC) held a press conference on 7 March 2016. During the conference, Minister of the MOF, Mr. Lou Jiwei, and his assistant, Mr. Xu Hongcai, answered questions from Chinese and foreign journalists which related to the fiscal work and the financial and tax reform. Hot topics include: progress of the financial and tax reform, reduction of fiscal revenue and IIT reform, etc.

As mentioned in the *Report on the Work of the Government* that the coming VAT reform shall ensure the reduction of effective tax burdens of all industries, Minister Lou said that because VAT on newly-added immovable properties has been included into the scope of creditable VAT, the reduction of effective tax burdens of all industries could be ensured. However, the situations of different enterprises will naturally vary and so it cannot be said for certain that the effective tax burden of every enterprise will reduce.

After the VAT reform, all immovable properties have been included into the scope of creditable VAT, which reduces the tax base. The central and local revenue will both be reduced. But BT is local tax purely collected by the local government while VAT revenue is shared between the central and local government. Therefore, tax revenue of the local government will reduce more. At present, the overall consideration is to arrange an interim mechanism for the division of central and local tax revenue to solve the problem of local revenue reduction. This is still based on the circumstances of keeping the current central and local revenue division.

Minister Lou also mentioned that the IIT reform program has been submitted to the State Council and the draft IIT Law will be submitted to the NPC for consideration. The draft IIT Law will be a preliminary one which combines the comprehensive and classified collection method of IIT. Mr. Lou also clearly mentioned that the IIT reform is complex and include lots of key difficult problems of tax administration and enforcement. The introduction and implementation of the reform will be step by step according to the situation. The simple part will be implemented firstly, and be improved gradually with the establishment of information system, collection and management conditions and habits of taxpayers.



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

Potential impacts on businesses:

• Effective tax burden reduced

You may click <u>here</u> to access full content of the circular.

MOF: Tax incentives will generally continue during the VAT reform period

Based on a recent news published on the official website of the MOF, on 8 March 2016, general office director and press spokesman of the MOF, Mr. Ou Wenhan, clarified that in order to further reduce the tax burden of enterprises, tax incentives will generally continue during the fully implementation period of VAT reform. There will be transition measures for specific industries to ensure that the tax burden of all sectors is not increased.

Since May 1st, the pilot scope of VAT reform will be expanded to construction, real estate, finance and lifestyle service industries. Considering the pressure of economic downturn, especially the difficulties of the real economy, when designing the reform program, the intensity and rhythm of the reform has been properly considered and arranged.

Regarding the improving of the tax regime encouraging the mass entrepreneurship and innovation, tax incentive policies will be designed to support investment in innovative activities for both seed period and initial periods, such as angel investment. Tax incentive policies in supporting the entrepreneur investment enterprises will be improved and the restriction on entrepreneur investment enterprises making investment in HNTEs will be relaxed. Tax incentives provided to technology business incubators and science and technology parks of universities will also be improved and there will also be supporting policies to group innovation spaces (GIS).

In 2016, in addition to implementation of the existing structural tax reduction policies, the MOF will also seek to take more measures to further reduce the effective tax burden and transaction cost. These new measures shall cover a wider scope, benefit more and be more specific.

You may click to read KPMG <u>China Tax Weekly Update (Issue 8, March 2016)</u>, <u>China Tax Weekly Update (Issue 7, February 2016)</u> and <u>China Tax Weekly Update (Issue 6, February 2016)</u>, to understand more details about the State Council policies with respect to facilitating the transformation of scientific and technological results, encouraging the development of GIS and expanding the entrepreneurial investment enterprise policies in the National Independent Innovation Demonstration Zones (NIIDZs) nationwide.



Relevant industries: Manufacturing industry and other strategic emerging industries Relevant companies: Enterprises located in or related to special customs regulation zones and enterprises engaged in the processing trade and strategic emerging industries Relevant taxes: Import Customs Duty / Import VAT

Potential impacts on businesses:

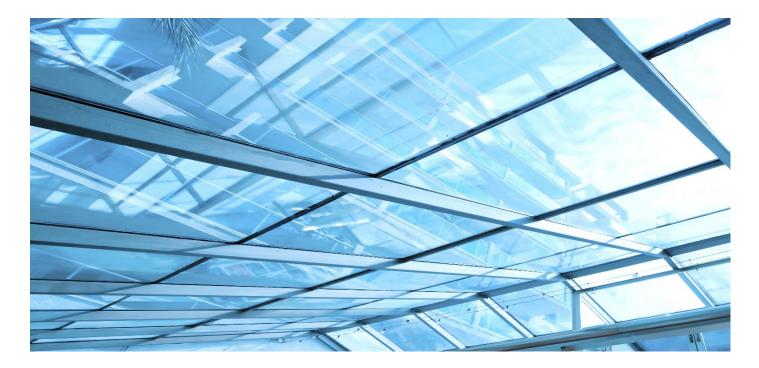
- Effective tax burden reduced
- Cash flow costs reduced
- Operational costs
 reduced

You may click <u>here</u> to access full content of the circular.

General Administration of Customs (GAC): Speed up the integration of special customs regulation zones

Based on a recent news published on the website of China's central government, the *Report on the Work of the Government* mentioned the work tasks that "further integrate and improve special customs regulation zones, encourage processing trade to move to the central and western regions and extend to the medium-high end of the industrial chain". Regarding this, Minister of the GAC, Mr. Yu Guangzhou, said that:

- The State Council held a meeting in Chongqing with all national special customs regulation zones in last September. According to the requirements of that meeting, the Customs will accelerate the integration of eligible special customs regulation zones being transitioned to comprehensive bonded zones. Newly established zones will be inclined to locate towards the central and western regions in order to promote the gradual transfer of processing trade.
- The Customs will make efforts in support those enterprises with good quality and strong power, in order to extend the industrial chain of processing trade toward the two ends. The Customs will also explore and implement full industrial chain customs bond supervision mechanism led by R&D enterprises, in order to promote the processing and manufacturing extended to R&D, inspection and maintenance, after-sale services, etc. This is also to support traditional products to upgrade to medium-to-high level so as to form new foreign trade growth point.
- The Customs will also positively support the development of strategic emerging industries by improving the policies and making innovations on the supervision models. The Customs will implement supervision model of "self-check by enterprises" so as to support the development of manufacturing industry of large equipment, such as aircraft, vessel, etc. and the development of the national strategic emerging industries.



Relevant industries: Partial industries Relevant companies: Enterprises engaged in cross-board e-commerce and enterprises related to import trade Relevant taxes: Import Customs Duty / Import VAT

Potential impacts on businesses:

- Operational costs
 reduced
- Effective tax burden reduced

You may click <u>here</u> to access full content of the circular.

GAC: Create new foreign trade growth point and guide the backflow of overseas consumption

Based on a recent news published on the official website of China's central Government, the *Report on the Work of the Government* mentioned the work tasks that "Expand trials in cross-border e-commerce" and "Decrease import tariffs on some consumer goods and increase the number of duty-free stores". Regarding this, Minister of the GAC, Mr. Yu Guangzhou, said that:

- Since the pilot work of cross-board e-commerce carried out, the GAC continually promote innovative ideas and methods to improve the new customs clearance supervision mode which adapted to the development of cross-board e-commerce. The Customs adopted such supporting measures as concluding the customs procedures within 24 hours all year around with no holidays to cross-board e-commerce. In addition, the Customs, jointly with other relevant authorities, formulated and improved the import tax policies for cross-border e-commerce retailing.
- Recently, the State Council approved to establish Pilot Cross-Border Ecommerce Zones in 12 Cities, such as Tianjin. The Customs are studying and drawing up management measures that can be copied and promoted from the pilot zones to nationwide. The next step is improving the customs supervision model as soon as possible. Meanwhile, the Customs will jointly will other relevant authorities revise the existing department regulations which are not suitable to the innovative development of cross-board ecommerce. This is to provide regulatory supporting for the development of pilot zones and to ensure the smooth implementation of the pilot work.
- Moreover, in addition to the reduction of import tariff rates of a substantial portion of consumer goods, the Customs will continue to study and put forward policies and suggestion about tax reduction. The State Council has also decided to establish or resume additional 19 duty-free shops at the ports to attract the backflow of overseas consumption.

* You may click to access KPMG <u>China Tax Weekly Update (Issue 3, January</u> <u>2016)</u> to understand more details about the Approval of the State Council on Establishing Cross-Border E-Commerce Comprehensive Pilot Zones in 12 Cities (Guo Han [2016] No. 17).



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Relevant industries: Within the scope of high and new technologies strongly supported by the government Relevant companies: Enterprises meet the conditions on recognition of HNTE enterprises Relevant taxes: CIT

Potential impacts on businesses:

- Possibility of qualifying for the HNTE relevant tax incentive need to be reassessed
- Compliance risks due to regulatory uncertainties reduced

You may click <u>here</u> to access full content of the circular.

Q&A by three departments on the new version of Administrative Measures for Recognition of High and New Technology Enterprise (HNTE)

On 29 January 2016, the Ministry of Science and Technology (MOST), the MOF and the State Administration of Taxation (SAT) jointly issued the revised Measures for Administration of Recognition of HNTE (Guo Ke Fa Huo [2016] No. 32, "the Recognition Measures"). The revised Recognition Measures revised the recognition criteria, procedures, supervision and administration to the existing recognition measures of HNTE.

Based on a recent news published on the SAT website, recently, the three people in charge of the Torch Center of the MOST, the Tax Administration of the MOF, the Income Tax Department of the SAT jointly answered questions about the content of the revised Recognition Measures. They explained the main revised content of the recognition measures and the change of the scope of high and new technologies strongly supported by the government. They also emphasized that:

- Upon obtaining the HNTE qualification, an enterprise does not need to get further approval from the tax authority. It can enjoy the relevant tax incentives directly upon performing the relevant recordal filing.
- Where the HNTE qualification of an enterprise is revoked, the recognition authority shall notify the tax authority about this. The tax authority will, based on the Tax Collection and Administration Law and the relevant provisions, recover the HNTE tax incentives claimed by the enterprise starting from the year in which the revoke happens.

* You may click to access KPMG <u>China Tax Alert: New Version of</u> <u>Administrative Measures for Recognition of High and New Technology</u> <u>Enterprise (HNTE) Released (Issue 5, February 2016)</u> to understand the main changes and impacts of the revised Recognition Measures.



Reference: SAT Announcement [2016] No.11 Issuance date: 28 February 2016 Effective date: 1 April 2016

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

Potential impacts on businesses:

• Compliance risks due to regulatory uncertainties reduced

You may click <u>here</u> to access full content of the circular.

Reference: Shui Zong Fa [2016] No.28 Issuance date: 28 February 2016 Effective date: N/A

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

Potential impacts on businesses:

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

You may click <u>here</u> to access full content of the circular.

SAT clarifies certain issues concerning the tax administrative approvals

Pursuant to the requirements of the State Council on intensifying the reform of the administrative approval system, the SAT has only retained 7 tax administrative approval items. Recently, the SAT issued SAT Announcement [2016] No. 11 ("Announcement 11") to clarify the implementation procedures and supervision and examination measures of these 7 tax administrative approval items. Announcement 11 also publishes the templates of 14 tax administrative approval documents, sets forth the List of Tax Administrative Approval Sub-Items, and lists the implementation basis and organizations, conditions, quantities, application materials and application deadlines of the 7 administrative approval items. Announcement 11 will take effective from 1 April 2016.

* The remaining 7 tax administrative approval items including:

- □ Approval for printing of invoices by enterprises
- D Approval for extension of time for tax payment
- Approval for extension of time for filing of tax return
- Approval for change of deemed tax payment in a lump-sum
- □ Approval for maximum invoicing amount for special VAT invoice (VAT tax control system)
- Approval for CIT prepayment methods other than prepayment based on actual profit amount
- Approval for a non-resident enterprise opting for its main organisation or premises to make consolidated payment of CIT

SAT issues guidance opinions on enhancing the inprocess and post administration

For the purposes of implementation of the *Intensified Reform Program for Administration of Tax Collection by State Tax Bureau and Local Tax Bureau ("the Collection and Administration Reform")*, the SAT recently issued Shui Zong Fa [2016] No. 28 ("Circular 28") putting forward guidance opinions. The purpose of Circular 28 is to further strengthening the in-process and post administration, and the following is three goals proposed:

- Continue to deepen the reform of tax administrative approval system, and achieve the transformation of taxation management from relying on advanced approval to enhancing in-process and post administrations
- Strengthen voluntary declaration by taxpayers. Improve the in-process and post administration mechanism which includes: recordal management, invoice management and filing management, etc.
- Guided by tax risk management, utilize the ideas, technologies and resources of big data to implement the action plan of "Internet Plus Tax" and promote the social co-governance

For the above 3 goals, Circular 28 also put forward 13 detailed measures.

* You may click to access KPMG <u>China Tax Weekly Update (Issue 4, February</u> <u>2016)</u> to understand more about the Collection and Administration Reform.



Barbara Forrest

Sandy Fung

Stanley Ho

Daniel Hui

Tel. +852 2978 8941

Tel. +852 2143 8821

Tel. +852 2826 7296

Tel. +852 2685 7815

daniel.hui@kpmg.com

Charles Kinsley Tel. +852 2826 8070

Tel. +852 2685 7457

Tel. +852 2978 8942

Tel. +852 2685 7605

Alice Leung Tel. +852 2143 8711

Steve Man Tel. +852 2978 8976

Ivor Morris

steve.man@kpmg.com

Tel. +852 2847 5092

Curtis Ng Tel. +852 2143 8709

curtis.ng@kpmg.com

Tel. +852 2143 8525

benjamin.pong@kpmg.com

malcolm.j.prebble@kpmg.com

Benjamin Pong

Malcolm Prebble

Nicholas Rykers

Murray Sarelius

Tel +852 2684 7472

Tel. +852 2143 8595

Tel. +852 3927 5671

David Siew Tel. +852 2143 8785

Tel. +852 2143 8790

Wade Wagatsuma

Lachlan Wolfers

Tel. +852 2685 7806

Tel. +852 2685 7791

Christopher Xing Tel. +852 2978 8965

Karmen Yeung

Adam Zhong

Tel. +852 2143 8753

Tel. +852 2685 7559

adam.zhong@kpmg.com

john.timpany@kpmg.com

wade.wagatsuma@kpmg.com

lachlan.wolfers@kpmg.com

christopher.xing@kpmg.com

karmen.yeung@kpmg.com

John Timpany

david.siew@kpmg.com

nicholas.rvkers@kpmq.com

murray.sarelius@kpmg.com

ivor.morris@kpmq.com

alice.leung@kpmg.com

jocelyn.lam@kpmg.com

kate.lai@kpmg.com

Jocelvn Lam

john.kondos@kpmg.com

John Kondos

Kate Lai

charles.kinsley@kpmg.com

stanlev.ho@kpmq.com

sandy.fung@kpmg.com

barbara.forrest@kpmg.com

For any enquiries, please send to our public mailbox: <u>taxenquiry@kpmg.com</u> 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

Oingdao 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

kpmg.com/cn

David Ling Head of Tax,

Northern China

Northern Region Tel. +86 (10) 8508 7083 david.ling@kpmg.com Vaughn Barber

Tel. +86 (10) 8508 7071 vaughn.barber@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

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

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

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

Paul Ma Tel. +86 (10) 8508 7076 paul.ma@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

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

State Shi Tel. +86 (10) 8508 7090 state.shi@kpmg.com

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

information without appropriate professional advice after a thorough examination of the particular situation.

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

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

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

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

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

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

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

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

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

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

Christopher Mak Tel. +86 (21) 2212 3409 christopher.mak@kpmg.com Henry Ngai Tel. +86 (21) 2212 3411 henry.ngai@kpmg.com

Tel. +86 (21) 2212 3360 yasuhiko.otani@kpmg.com Ruqiang Pan

Yasuhiko Otani

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

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

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

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

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

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

Bruce Xu

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

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

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

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

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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

Ryan Huang Tel. +86 (20) 3813 8621 ryan.huang@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

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

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

Hong Kong

Lu Chen

Tel. +852 2143 8777

lu.l.chen@kpmg.com

Rebecca Chin Tel. +852 2978 8987

Matthew Fenwick

Tel +852 2143 8761

rebecca.chin@kpmg.com

matthew.fenwick@kpmg.com

Lixin Zeng

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