



China Tax Weekly Update

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Relevant industries: All
Relevant companies:
Multinational enterprises
(MNEs)
Relevant taxes: All

Potential impacts on
businesses:

- Risks of being challenged due to cross-border tax anti-avoidance arrangements increased

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

The 10th FTA meeting held in Beijing

The 10th Forum of Tax Administration (FTA) meeting, which is organized by OECD and host by the State Administration of Taxation (SAT) of China, was held from 11 to 13 May 2016 in Beijing. This is the first FTA meeting held after the BEPS Deliverables were presented (Oct 2015) and the BEPS implementation work commenced. Based on the Communiqué released at the close of the meeting, the following three points of consensus have been reached and tax commissioners present at the FTA meeting are committed to:

- Effective implementation of the G20/OECD international tax agenda, requiring co-ordinated action from all tax commissioners
- Building modern tax administrations that effectively respond to the challenges and opportunities of an increasing digital world; and
- Helping build tax administration capacity so that all countries, and in particular developing countries, can benefit from the changes in the international tax landscape and better mobilise the resources they need

The FTA meeting was also the occasion for the signing ceremony of the Multilateral Competent Authority Agreement for the automatic exchange of Country-by-Country reports (CBC MCAA). Canada, Iceland, India, Israel, New Zealand and the People's Republic of China joined the Agreement, bringing the total number of signatories to 39 countries. In signing the CBC MCAA, the signatories promised that the Country-by-Country reports compiled by MNEs, and filed with the signatories, shall be exchanged automatically among the signatories.

- The obligations of MNEs with respect to information submission, as well as the obligations of tax administrations with respect to information exchange, have been clarified in the CBC MCAA. It will ensure that tax administrations obtain a complete understanding of the way MNEs structure their operations and will facilitate tax compliance so that a fair international taxation system will be created
- The CBC MCAA requires that where the global consolidated income of a MNE group exceeds Euro 750 million, its parent company shall provide information on: (i). World-wide income of the group; (ii). Global allocation of taxes paid and location of economic activity within the MNE group; (iii). Other indicators to the tax authority of the country where the parent company is located. MNEs shall submit the CBC reports on Transfer Pricing for the year of 2016 in 2017 and these information expect to be exchanged among the tax administrations of signatories in 2018. Afterwards, the reports will be submitted and exchanged annually.

- Following the signing of the CBC MCAA, the SAT will formulate relevant circulars to drive the establishment of information system, set up the platform for information exchange so as to ensure the exchange of CBC reports go well

In addition, China has also signed the Memorandum of Understanding on Taxation Cooperation with Canada and US separately.

* For other information about the FTA meeting, you may click KPMG [China Tax Weekly Update \(Issue 17, May 2016\)](#) to understand the details.

Reference: Cai Shui [2016] No. 53 / 54 / 55
 Issuance date: 9 May 2016
 Effective date: 1 July 2016

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

Potential impacts on businesses:

- Preparation work may need to be set about by relevant enterprises
- Existing operating model may need to be adjusted

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

China to drive Resource Tax reform comprehensively

On 9 May 2016, the Ministry of Finance (MOF), the State Administration of Taxation (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. China will implement a reform of expanding the scope of collection of the Resource Tax as well as transitioning it from a volume basis tax to a price basis tax. The main objectives of the reform are to regularise the interaction between the Resource Taxes and fees and to establish a more fair, reasonable, and efficient Resource Tax system.

- [MOF and SAT's Notice on Comprehensive Implementation of the Resource Tax Reform \(Cai Shui \[2016\] No. 53, "Circular 53"\)](#)
- Circular 53 is the programmatic document for fully implementing Resource Tax reform, in which the basic principles, main objectives and contents of the reform have been set out. The key contents are extracted as follows:

Expand the scope of Resource Tax	<ul style="list-style-type: none"> • Initiate the pilot program for water resource reform in Hebei. This involves transforming water resource fees to taxes. It also involves including surface water and underground water in the collection scope of water taxation and levying the taxes on a volume basis • Gradually include other natural resources into the collection scope. The specific plan for collection of Resource Tax for forests, pastures and shoals shall be proposed by the governments at provincial level and is subject to approval by the State Council
Implement a reform of Resource Tax for minerals taxed on a price basis	<ul style="list-style-type: none"> • Taxation on a price basis will apply for 21 named resource items and other metal ores listed in the Table of Tax Items and Tax Rates for Resource Tax (the "Table"). For clay and sandstone, they shall still be taxed on a volume basis • For other non-metal ores listed in the Table, they shall be taxed on a price basis as the preferred method, supplemented by the collection method on a volume basis. The governments at provincial level shall select the collection method
Abolish local fees/ funds for mineral resources	<ul style="list-style-type: none"> • Reduce the rate of mineral resource royalty fees to zero, stop collection of the price regulating fund, and abolish various fees and funds set up for mineral resources by local governments without authorization
Set reasonable Resource Tax rates	<ul style="list-style-type: none"> • Governments at provincial level may determine or propose the tax items and tax rates for Resource Tax within the prescribed rates range or depending on their actual situation. The tax items and tax rates shall be reported to MOF and SAT for approval and record-filing

<p>Preferential mineral resource tax policies to increase utilization efficiency</p>	<ul style="list-style-type: none"> Resource Tax on mineral resource exploited by the filing mining method shall be subject to 50% reduction; Resource Tax on mineral resource exploited in the exhaustion stage and low abundance oilfields shall be subject to 30% reduction For Minerals extracted from low-grade ore, waste rock, tailings, waste residue, waste water and waste gas, their Resource Tax reduction or exemption shall be determined by the governments at provincial level based on the actual situation. The governments shall also formulate the specific measures on tax reduction and exemption
<p>Income distribution system and expenditure guarantee</p>	<ul style="list-style-type: none"> Resource Tax revenue derived from those minerals that are newly included in the reform falls within local fiscal revenue Central government is entitled to get 10% of Water Resource Tax collected, while the local governments will get other 90%. (This allocation is the same as water resource fees)

☐ [*MOF and SAT Clarify Specific Policies in Resource Tax Reform \(Cai Shui \[2016\] No. 54, "Circular 54"\)*](#)

- In order to help better implement Circular 53 in relation to Resource Tax reform, Circular 54 clarified certain specific policies for Resource Tax reform (Water Resource Tax excluded). This includes determination of tax base and applicable tax rates, tax preferential policy and management, tax collection and exemption on associated mineral resources, time of payment obligation and place of payment

☐ [*MOF, SAT and MWR Issue the Pilot Provisional Regulation on Water Resource Tax Reform \(Cai Shui \[2016\] No. 55, "Circular 55"\)*](#)

- Pursuant to Circular 53, the pilot program of Water Resource Tax reform will be initiated in Hebei. Consequently, Interim Measures for Water Resource Tax Reform is set out in Circular 55, which clarifies relevant issues for the collection of Water Resource Tax in Hebei.

Reference: SAT
Announcement [2016] No. 28
/ 29 / 30 and Shui Zong Han
[2016] No. 192
Issuance date: 3 May 2016
to 10 May 2016
Effective date: 1 May 2016
(Announcement 30 will take
effective from 1 June 2016)

Relevant industries: All
(especially for industries of
construction, real estate,
financial and lifestyle
services)

Relevant companies: All
(especially for enterprises
engaged in construction, real
estate, finance and lifestyle
services)

Relevant taxes: VAT / CIT

Potential impacts on
businesses:

- Compliance risks due to
regulatory uncertainties
reduced

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

Four VAT reform implementation rules issued by SAT

In order to help better implement the new VAT reform rules *Measures for Implementation of the Pilot Program of VAT Reform* (Cai Shui [2016] No. 36, "Circular 36"), recently, SAT issued 4 implementation rules. These clarify/revise the formula for calculating the taxable income of non-resident enterprises, administration on VAT exemption for cross-border behaviour subject to VAT and other materials for VAT filing etc.

❑ [SAT Revises the Cost-plus Formula for Calculating Taxable Income of Non-resident Enterprises \(SAT Announcement \[2016\] No.28\)](#)

- This circular is relevant to corporate income tax (CIT) on representative offices and permanent establishments of foreign enterprises in China.
- After the VAT reform, the cost-plus formula for calculating the taxable income of Non-resident enterprises stipulated in *Interim Measures on Administration of Tax Collection for Resident Representative Offices of Foreign Enterprises* (Guo Shui Fa [2010] No.18) and *Administrative Measures on Assessment and Collection of Income Tax from Non-resident Enterprises* (Guo Shui Fa [2010] No.19) are revised by removing Business Tax deduction. The current formula is as follows:

Taxable income = current expenditure / (1- approved profit margin) × approved profit margin

- The original formula is: Taxable income = total expenditure / (1- approved profit margin – Business Tax rate) × approved profit margin

❑ [SAT Issues Provisional Administrative Measures on VAT Exemption for Cross-border Activities Subject to VAT under VAT Reform \(SAT Announcement \[2016\] No.29, "Announcement 29"\)](#)

- Based on the *Provisions on Application of Zero VAT Rate and Exemption Policies to Cross-Border Taxable Activities* (Attachment 4 of Circular 36, "Attachment 4") and the *Provisional Administrative Measures for VAT Exemption for Cross-Border Taxable Services under VAT Reform* (SAT Announcement [2014] No. 49, "the previous measures"), SAT issued Announcement 29. This is intended to further clarify the service categories and content of cross-border taxable activities subject to VAT exemption. In comparison with the previous measures, Announcement 29 made the following revisions and improvements
 - ❖ Cross-border taxable activities occurred in construction, finance and lifestyle services are included and subject to VAT exemption. The specific regulations and implementation criteria for the aforesaid cross-border taxable activities enjoying tax exemption policy are clarified
 - ❖ Pursuant to the provisions of Attachment 4, Announcement 29 further standardizes and refines the tax exemption policy implementation criteria of the cross-border services that have been included in the VAT reform previously
 - ❖ Pursuant to *Measures for Administration of Tax relief* (SAT Announcement [2015] No. 43), Announcement 29 further standardize the filing procedure for cross-border taxable services subject to tax exemption
 - ❖ For cross-border taxable activities that conform to the zero tax rate policy but adopt the simple taxation method or for which tax exemption is selected by declaring the waiver of the zero tax rate, Announcement 29 makes an adjustment. It requires the taxpayers to provide the declaration that waives the application of zero tax rate and choose tax exemption instead as well as other materials for record-filing of tax exemption

- ❑ [SAT Adjusts VAT Filing Forms for Certain Industries under VAT Reform \(SAT Announcement \[2016\] No. 30, "Announcement 30"\)](#)
 - Announcement 30 clarifies the incorporation of the Sheet for Analysis & Calculation of Tax Burdens Following VAT Reform into other materials for VAT filing. These will be completed by the general VAT taxpayers that are engaged in construction, real estate, finance or lifestyle services upon performance of VAT filing. A list of specific taxpayers who need to fill out the form will be issued by the in-charge tax authorities
- ❑ [SAT Issues Notice on Ensuring Smooth Transition of Invoice Administration between State and Local Tax Bureaus \(Shui Zong Han \[2016\] No.192\)](#)
 - Local tax authorities shall no longer be allowed to issue the invoices to taxpayers who are subject to VAT reform after 1 May 2016. The local tax authorities shall not print the invoices and the printed invoices shall be cancelled
 - Invoices printed by local tax authorities as well as other invoices bearing the name of the company that have been received by taxpayers prior to 30 April 2016 may continue to be used until 30 June 2016. Any taxpayer that receives invoice from the state tax authority for the first time must hand over all invoices issued by the local tax authority for cancellation before receiving the VAT invoices; for any taxpayer that has received invoices from the state tax authority, all invoices issued by the local tax authority must be handed over for cancellation

Besides, on 6 May 2016, the Tianjin State Tax Bureau issued [Announcement on VAT Collection and Administration for Cross-district Construction Services \(Announcement \[2016\] No. 8\)](#), clarifying that taxpayers in Tianjin who provides cross-district construction services shall prepay VAT to the in-charge state tax bureaus where the construction services take place. At the same time, the VAT filing and payment shall be performed with the in-charge state tax bureaus where the taxpayer is located. The Announcement also clarifies tax prepayment management, filing management, deduction certificates for sub-contracting fees, time and deadline for tax payment as well as invoice issuance etc.

* 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](#) and [Issue 17](#) 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 \(Issue 12, March 2016\)](#)

Reference: Guo Fa [2016] No. 27

Issuance date: 9 May 2016

Effective date: N/A

Relevant industries: All
 Relevant companies:
 Enterprises that carry out cross-border transaction
 Relevant taxes: N/A

Potential impacts on businesses:

- Restrictions on export trade reduced
- Facilitate the development of cross-border transaction

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

State Council seeks to promote foreign trade

In order to promote the stable and sound development of foreign trade, the State Council issued Guo Fa [2016] No. 27 ("Circular 27") on 9 May 2016. Circular 27 puts forward 14 measures including policy adjustment and improvement for export tax refund, exemption and standardization of enterprise-related fees, policy improvement for the processing trade and implementation of import policy etc. The financial and tax related measures are abstracted as follows:

Export tax refunds	<ul style="list-style-type: none"> • Optimize structure of tax refund rates for export. Certain mechanical and electrical products such as cameras, video cameras and explosive motors are now entitled to enjoy the tax refund based on how much tax has been paid • Improve the classification management for export tax refund as well as to gradually increase the ratio of export enterprises classified under category 1 for export tax refund (Based on SAT Announcement [2015] No. 2, export enterprises classified under Category 1 may, upon declaration of the relevant electronic information for export tax refund (exemption) and passing preliminary examination, make a formal declaration, original vouchers are not required to be provided at the time of declaration, and the corresponding original vouchers shall be retained by the enterprise for future inspection)
Processing trade	<ul style="list-style-type: none"> • Comprehensively use the policies for finance, land and monetary to facilitate the transfer of processing trade to central and western regions • Cancel the MOFCOM pre-approval requirement for processing trade nationwide and strengthen contemporaneous and follow up administration • Explore a pilot program for goods to be monitored based on classification in qualified special customs supervision zones. General VAT taxpayer qualification are entitled to eligible enterprises • Push forward the pilot program on selective tariff policy in special customs supervision zones of pilot FTZs
Implementation of import policy	<ul style="list-style-type: none"> • Improve the existing administrative measures for sale of automobile brands, and speed up the parallel imports of automobiles • Grant the qualification for use and import of crude oil to eligible crude oil processing enterprises • Reduce tariff for certain consumer goods and get Chinese people shopping abroad to shop in China instead

More supports for new business type of foreign trade

- Expand the pilot program of enterprises carrying out the integrated services including cross-border e-commerce, market procurement trade and foreign trade:
 - ❑ Support enterprises to establish “overseas warehouses” and overseas operation centres for exports
 - ❑ Based on the experiences of China (Hangzhou) Cross-Border E-Commerce Comprehensive Pilot Zone and market procurement trade method, expand the pilot areas accordingly. Export enterprises eligible for supervision in pilot areas, are entitled to enjoy VAT exemption (no refund) if the invoice for input tax cannot be provided
 - ❑ Accelerate setting up a management system to adapt to the development of foreign trade integrated services enterprises (FTISEs), and improve the administrative measures on categorisation of FTISEs for export tax refund (exemption)

Reference: Guo Fa [2016] No. 24
 Issuance date: 5 May 2016
 Effective date: 19 April 2016 to 21 December 2018

Relevant industries: All
 Relevant companies: All enterprises in Shanghai Pudong new area
 Relevant taxes: N/A

Potential impacts on businesses:

- Compliance costs reduced
- Compliance risks due to regulatory uncertainties reduced

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

State Council adjusts certain administrative approval items for Shanghai Pudong new area

On 5 May 2016, the State Council issued Guo Fa [2016] No. 24 (“Circular 24”) to temporarily adjust 11 administrative approval items stipulated in relevant administrative regulations and State Council’s documents for Shanghai Pudong new area, effective from 19 April 2016 to 21 December 2018. The specific adjustments are as follow:

Adjustments	Administrative approval items
The administrative approval items are suspended, contemporaneous and follow up administration shall be enhanced	<ul style="list-style-type: none"> • Record-filing for operating of publications rent • Cross-location record-filing for drug ads • License for radioactive pharmaceuticals used by medical institution (Category I and II) • Recognition of intermediary agency qualifying to carry out intermediary services for exit and entry for personal reasons (for work and study abroad are excluded)
The administrative approval items are suspended, and the administration of filing will be carried out instead	<ul style="list-style-type: none"> • Approval for processing trade contract • Administrative license for first import of cosmetics (not for special purposes)

Circular 24 also clarifies that the State Council will revise the Circular 24 in due course depends on the implementation of “certificate-licence separation” pilot.

Reference: Cai Shui [2016]
No. 45
Issuance date: 20 April 2016
Effective date: 1 January
2016

Relevant industries: All
Relevant companies:
Enterprises making equity
donation for charity purposes
Relevant taxes: CIT

Potential impacts on
businesses:

- Effective tax burden reduced
- Compliance risks due to regulatory uncertainties reduced

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

MOF and SAT clarify CIT policies concerning equity donation for charity purposes

On 20 April 2016, the MOF and the SAT jointly issued Cai Shui [2016] No. 45 ("Circular 45") to clarify Corporate Income Tax (CIT) policies concerning equity donation for charity purposes.

- Equity donations made by the enterprises to the public interest social institutions shall be deemed as equity transfer as required, and the income from equity transfer shall be determined at the historical cost upon acquisition of the equities donated by the enterprises
- Once an enterprise makes equity donation, the historical cost of the equities shall be used as the basis for determining the amount of donation, and be deducted before the income tax in accordance with applicable provisions of the *Corporate Income Tax Law*. (According to the *Corporate Income Tax Law*, expenditure in the form of charitable donations and gifts within 12% of the gross annual profit by an enterprise may be deducted when computing the taxable amount of income.)
- After receiving the public interest equity donations, the public interest social institution shall issue the donation invoice based on the historical cost of the equities provided by the donating enterprise

Circular 45 also gives a definition of equity, public interest social institutions and equity donation as mentioned in the circular, effective from 1 January 2016.





MOF Clarifies Tax Treatments for Exhibition Goods Retained and Purchased During International Exhibitions Held in Central and Western China During the 13th FYP (Cai Guan Shui [2016] No. 21)

On 18 April 2016, the MOF issued Cai Guan Shui [2016] No. 21, clarifying treatment of imported duties, VAT and Consumption Tax for exhibition goods retained and purchased during international exhibitions held in Central and Western China during the 13th FYP.

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

MOF and SAT Clarify VAT Refund Policies for Goods & Services Purchased by Foreign Embassies or Consulates in China and Their Functionaries (Cai Shui [2016] No. 51)

On 29 April 2016, the MOF and the SAT jointly issued Cai Shui [2016] No. 51, in which the VAT refund policies applied to goods and services purchased by foreign embassies or consulates in China as well as their functionaries after VAT reform have been clarified, effective from 1 May 2016.

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

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