



China Tax Newsletter

September 2019

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1. VAT Collection and Administration Issues Such as Input VAT Credit for Domestic Passenger Transportation Services

In order to unify tax collection and administration standards so as to facilitate VAT taxpayers' execution, the State Taxation Administration released the Announcement on VAT Collection and Administration Issues Such as Input VAT Credit for Domestic Passenger Transportation Services (Announcement of the State Taxation Administration [2019] No. 31). The main content is as follows:

① Input VAT credit relating to domestic passenger transportation services

Article	Main content
Scope of credit	"Domestic passenger transportation services" for which the input VAT are allowed to be credited shall be limited to domestic passenger transportation services enjoyed by employees who have entered into labor contracts with their employer, as well as dispatched laborers accepted by an organization as their employer.
Invoice issuance	For domestic passenger transportation services procured by a taxpayer, where the input VAT amount is the tax amount indicated on the electronic general VAT invoice obtained, the information indicated on the electronic general VAT invoice such as "name", "taxpayer identification number" etc. of the buyer shall be consistent with the taxpayer who declares the credit, otherwise no credit is allowed.
Crediting policy transition	Input VAT amount for domestic passenger transportation services allowed to be credited by a taxpayer shall mean VAT amount actually incurred by the taxpayer on or after 1 April 2019, which is indicated on a legitimate and valid VAT payment voucher obtained or computed on the basis of such voucher. Where a special VAT invoice or an electronic general VAT invoice is the VAT payment voucher, it shall be a special VAT invoice or an electronic general VAT invoice issued on or after April 1, 2019.

② Additional deduction

Article	Main content
Sales revenue	Including sales revenue declared in tax returns, sales amount corresponding to output tax amount required to be supplemented retrospectively, and sales revenue adjusted upon assessment by the tax authorities. The sales amount corresponding to output tax amount required to be supplemented retrospectively and the sales revenue adjusted upon assessment by the tax authorities shall be included in the sales revenue of the current period of the supplement or adjustment as the basis for determination of the applicability of the additional deduction policies; where the VAT difference levying and collection policy is applicable, the differentiation sales amount shall be the basis for determination of the applicability of additional deduction policies.
Taxpayers temporarily with no sales revenue	Taxpayers established before March 31, 2019 and whose sales revenue is zero throughout April 2018 to March 2019, the sales revenue for the three consecutive months following the generation of the first sales revenue shall be the basis for determination of the applicability of additional deduction policies. For taxpayers established after April 1, 2019 and whose sales revenue is zero throughout the three months since the date of establishment, the sales revenue for the three consecutive months following the generation of the first sales revenue shall be the basis for determination of the applicability of additional deduction policies.



Article	Main content
Head office and branches with consolidated VAT payment	Upon approval by the Ministry of Finance and the State Taxation Administration or the authorized financial and tax authorities, a head office and its branches which implement consolidated payment of VAT can use the aggregate sales revenue of the head office and its branches as the basis for determination of the applicability of additional deduction policies on the head office and its branches.

③ Applicability of tax exemption policies for small-scale taxpayers operating for less than one tax period

With effect from January 1, 2019, small-scale taxpayers with quarterly VAT payment which are established or deregistered in the middle of a quarter and thus operated for less than a quarter in the current period shall be exempted from VAT if the sales revenue in the current period does not exceed RMB300,000.

④ Small-scale taxpayers in cargo transportation industry applying for issuance of special VAT invoices by tax authorities

The criteria for being eligible to apply for issuance of special VAT invoices by tax authorities: Those providing road cargo transportation services (except for those engaged in ordinary road cargo transportation business using normal cargo vehicles of 4.5 tons and less) shall obtain a "Road Transportation Business License of the People's Republic of China" and a "Road Transportation License of the People's Republic of China"; those providing inland cargo transportation services shall obtain a "Domestic Waterway Transportation Business License" and a "Ship Business Transportation License".

⑤ Tax items applicable for transportation vehicle cabin contracting and cabin exchange business

Article	Nature	Main content
Transportation vehicle cabin contracting business	Definition	Transportation vehicle cabin contracting business shall mean the business activities of the contracting party entering into a transportation service contract as carrier with the shipper, collecting freight and assuming carrier liabilities, then contracting cabin from others' transportation vehicles, and entrusting the contract awarding party to complete the relevant transportation services.
	Provision	For transportation vehicle cabin contracting business, the sales revenue shall be the full price and other fees collected by the contract awarding party from the contracting party, and shall be subject to VAT as per "transportation services". The sales revenue of the contracting party shall be the full price and other fees collected from the shipper, and shall be subject to VAT as per "transportation services".
Transportation vehicle cabin exchange business	Definition	Transportation vehicle cabin exchange business shall mean the business activities of the taxpayers entering into a transportation agreement, and in the transportation business transactions undertaken by the taxpayers each as carriers, using each other's transportation vehicle cabins to complete the relevant transportation services.



Article	Nature	Main content
	Provision	The sales revenue shall be the full price and other fees for exchanging transportation vehicle cabins, as confirmed by both parties, and shall be subject to VAT as per "transportation services".

⑥ Deduction of subcontracting payment for construction services

For a taxpayer providing construction services, the subcontracting payment allowed to be deducted from the full price and other fees obtained by the taxpayer pursuant to the provisions shall mean the full price and other fees paid to the subcontracting party.

⑦ Cancellation of filing of items under simplified tax computation method for construction services

Where general VAT taxpayers providing construction services shall adopt or opt to adopt the simplified tax computation method to calculate the tax amounts according to regulations, filing formalities are no longer required. The following proof materials are no longer required to be submitted to the tax authorities, and shall be kept by the taxpayer for future inspection: Taxpayers providing construction services for old construction projects shall keep the "Construction Project Construction Permit" or the contract for the construction project; taxpayers providing construction services for "Party A supplying materials" projects, or providing construction services in the form of "services only without supply of materials" shall keep the contract for the construction project.

⑧ Application of the simplified tax computation method for real estate development projects with land reclamation from the sea

For a real estate project developed on reclaimed land from the sea obtained by a real estate development enterprise who is a general VAT taxpayer, where the date of commencement of land reclamation from the sea indicated on the "Construction Permit of Construction Projects" or the contract for construction projects of the land reclamation project is before April 30, 2016, the construction project falls into the scope of old real estate projects, and the real estate development enterprise may opt to adopt the simplified tax computation method to compute and pay VAT at the levy rate of 5%.

⑨ Determination of purchase price of restricted shares

Article	Main content
Determination of purchase price of restricted shares due to various reasons	Where a shareholder transfers restricted shares due to initial public offering and listing as a result of concurrent implementation of share split reform and significant asset restructuring, as well as bonus shares and converted shares deriving from the aforesaid shares during the period from the first day of listing to the date on which the restriction is lifted, the purchase price shall be the opening price of the first day of listing of the shares of the aforesaid listed company, and shall be subject to VAT as per "transfer of financial commodities".
Determination of purchase price of restricted shares	For restricted shares derived from significant asset restructuring implemented by a listed company, as well as bonus shares and converted shares derived from the aforesaid shares during the period from the date of



Article	Main content
due to significant asset restructuring	resumption of listing to the date on which the restriction is lifted, the purchase price shall be the closing price of the trading day preceding suspension of trading of the aforesaid listed company's shares due to significant asset restructuring.

⑩ Input VAT credit for insurance services

Services rendered by taxpayers	Provisions
Undertaking motor vehicle insurance liability in the form of in-kind compensation	Where such taxpayer purchases vehicle repair services from a party providing vehicle repair services, the input VAT thereof may be credited against the insurance company's output VAT pursuant to relevant provisions.
Undertaking motor vehicle insurance liability in the form of cash compensation	Where such taxpayer pays compensation monies payable to the insured directly to the party providing vehicle repair services, this shall not be deemed as purchase of vehicle repair services by the insurance company, and the input VAT thereof shall not be credited against the insurance company's output VAT.
Other property insurance services	Other property insurance services provided by taxpayers shall be implemented with reference to the aforesaid provisions.

2. Period-end Uncredited VAT Refund Policies for Certain Advanced Manufacturing Industries

For the purpose of further promoting high-quality development of the manufacturing sector, the Ministry of Finance and the State Taxation Administration released the Announcement on Clarifying Period-end Uncredited VAT Refund Policies for Certain Advanced Manufacturing Industries (Announcement of the Ministry of Finance and the State Taxation Administration [2019] No. 84). The main content is as follows:

With effect from June 1, 2019, taxpayers in certain advanced manufacturing industries who satisfy all the following criteria may apply to the competent tax authorities for refund of incremental period-end uncredited VAT with effect from July 2019 and subsequent tax declaration periods:

- ① The amount of incremental period-end uncredited VAT is more than zero;
- ② The taxpayer credit rating is grade A or grade B;
- ③ A taxpayer has no record of fraudulent claim of uncredited VAT refund, export rebate or issuance of false special VAT invoices during the 36-month period preceding the application for refund;
- ④ A taxpayer has not been subject to tax evasion punishment imposed by tax authorities for two times and more during the 36-month period preceding the application for refund; and
- ⑤ A taxpayer has not enjoyed the refund-upon-levying or levy-then-refund incentives since April 1, 2019.

Refundable period-end uncredited VAT = incremental period-end uncredited VAT x input VAT composition ratio



Input VAT composition ratio shall mean the proportion of credited VAT amount on special VAT invoices (including tax-control unified invoices for motor vehicle sales), special Customs payment certificate for import VAT, and tax payment vouchers within the tax period from April 2019 to the tax period preceding the application for tax refund, to all credited input VAT in the same period.

The above-mentioned taxpayers in certain advanced manufacturing industries shall mean taxpayers undertaking manufacturing and sales of non-metallic mineral products, general equipment, special equipment and computers, communications and other electronic equipment in accordance with the "National Economic Industry Classification" whose sales revenue of such products account for more than 50% of their total sales revenue.

3. Pre-enterprise-income-tax Deduction Policies Relating to Loan Loss Provision of Financial Enterprises

The Ministry of Finance and the State Taxation Administration jointly released the Announcement on Pre-enterprise-income-tax Deduction Policies Relating to Loan Loss Provision of Financial Enterprises for Agriculture-related Loans and Loans to Small and Medium-sized Enterprises (Announcement of the Ministry of Finance and the State Taxation Administration [2019] No. 85) and the Announcement on Pre-enterprise-income-tax Deduction Policies Relating to Loan Loss Provision of Financial Enterprises (Announcement of the Ministry of Finance and the State Taxation Administration [2019] No. 86). These two announcements shall be implemented from January 1, 2019 to December 31, 2023. The main content is as follows:

- ① Pre-enterprise-income-tax deduction policies relating to loan loss provision of financial enterprises for agriculture-related loans and loans to small and medium-sized enterprises

Upon risk categorization for its agriculture-related loans and loans to small and medium-sized enterprises pursuant to the Guidelines on Loan Risk Categories (Yin Jian Fa [2007] No. 54), loan loss provision accrued by a financial enterprise in accordance with the following ratios shall be allowed to be deducted at the time of computation of taxable income amount:

No.	Type of loans	Ratio
1	Special mention	2%
2	Subprime	25%
3	Doubtful	50%
4	Loss	100%

Agriculture-related loans referred to in this Announcement shall mean farmer loans and loans to rural enterprises and various organizations included in the Special Statistics Policy on Agriculture-related Loans (Yin Fa [2007] No. 246); loans to small and medium-sized enterprises referred to in this Announcement shall mean loans from financial enterprises to enterprises whose annual sales and total assets both do not exceed RMB200 million.



Qualified losses incurred by financial enterprises in relation to agriculture-related loans and loans to small and medium-sized enterprises shall first be offset against the loan loss provision which has been deducted before the enterprise income tax; the portion which remains thereafter may be deducted accordingly at the time of computation of taxable income amount.

② Pre-enterprise-income-tax deduction policies relating to other loan assets for which pre-enterprise-income-tax accrual of loan loss provision is allowed

Loan loss provision allowed for pre-enterprise-income-tax deduction for the current year = loan asset balance from which the loan loss provision is allowed for accrual at end of current year × 1% — balance of loan loss provision deducted before enterprise income tax as of the end of the preceding year

Qualified losses incurred by financial enterprises shall first be offset against the loan loss provision which has been deducted before enterprise income tax, and the portion which remains thereafter may be deducted accordingly at the time of computation of the annual taxable income amount. Where the figure derived by a financial enterprise from the aforesaid formula is negative, the taxable income amount for the current year shall be increased accordingly.

The scope of loan assets for which loan loss provision is allowed for accrual before enterprise income tax include loans (including mortgage, pledge, guarantee, credit loans, etc.); risk assets with loan characteristics such as bank card overdraft, discount, credit advance (including bank acceptance bill advance, letter of credit advance, guarantee advance, etc.), import and export bill advance, interbank lending, financing lease receivable, etc.; overseas loans on-lent by financial enterprises which are liable for external repayment, including assets such as loans from international financial organizations, foreign buyer's credit, foreign government loans, unconditional loans from Japan International Cooperation Bank, foreign government hybrid loans etc.

③ Assets not allowed for accrual of loan loss provision

Assets of financial enterprises which do not assume risks and losses such as entrusted loans, agency loans, treasury bond investments, dividends receivable, provision turned over to the Central Bank as well as asset-stripped financial enterprises' rights and equity, financial interest receivable, due from Central Bank etc., and other risk assets other than assets set out in the foregoing shall not accrue loan loss provision for pre-enterprise-income-tax deduction.

4. Law of the People's Republic of China on Farmland Occupation Tax and Implementation Measures of Law of the People's Republic of China on Farmland Occupation Tax Came into Effect

Law of the People's Republic of China on Farmland Occupation Tax (Decree [2018] No. 18 of the President of the People's Republic of China) and Implementation Measures of Law of the People's Republic of China on Farmland Occupation Tax (Announcement of the Ministry of Finance [2019] No. 81) came into effect on



September 1, 2019. Compared with previous provisional regulations and implementation regulations, the main changes are as follows:

① Detailed provisions for taxpayers under various situations

Where occupation of farmland is approved, the taxpayer shall be the construction land user indicated in the approval document for the conversion of farmland; where the construction land user is not indicated in the approval document for the conversion of farmland, the taxpayer shall be the applicant for land use. Where the land use applicant is the people's government at any level, land reserve centers at the same level, competent departments of natural resources or other departments or entities as entrusted by the government shall fulfill the obligations of declaring and paying the farmland occupation tax. Where farmland is occupied without approval, the taxpayer shall be the actual land user.

② Adjustments on the tax collection scope

- Modify the "meadow" as "grassland";
- Adjust the detailed tax collection scope of forest land, meadow and fishery area tidal flats;
- Add in "garden plot" (including orchard, tea garden, rubber estate and other gardens);
- Repeal the provision that "Lands which have been used for growing crops within 3 years before occupation shall be deemed as farmland";
- Stipulate two types of special situations under which levying of farmland occupation tax is not required: (a) Those that occupy farmland for building farmland irrigation facilities are exempted from farmland occupation tax; and (b) Those that occupy parks, forest land, grassland, land for farmland irrigation, water surfaces for breeding, fishery area tidal flats and other agricultural land for the construct of production facilities to directly serve agricultural production shall be exempted from farmland occupation tax.

③ Adjustment on the right of determining the applicable tax rate

Originally governments at the province level are entitled to the right of determining detailed applicable tax rate. At present, the right belongs to the standing committee of provincial people's congress. The law classified the average tax rate of farmland occupation tax for all provinces in China into 9 bands. The average tax rate of farmland occupation tax in all provinces shall be not less than the tax amounts as set out in the average tax amount table. For those that occupy parks, forest land, grassland, land for farmland irrigation, water surfaces for breeding, fishery area tidal flats and other agricultural land to construct buildings or structures or engage in non-agricultural constructions, the applicable tax rates may be appropriately lower than the local applicable tax rates, provided that the decrease shall not exceed 50%.

④ Adjustments on tax preferences

- Extend the scope of "nursing home" to "social welfare organizations" and



- “hospitals” to “medical institutions”;
- Add in “water conservancy projects” to be eligible for tax reduction. Farmland occupied by water conservancy projects shall be subject to farmland occupation tax at the reduced rate of RMB2.0 per square meter;
 - For the farmland occupation tax exemption or reduction for occupation of farmland by residents of farm villages to construct new residential buildings, the Law added the prerequisites of “within the prescribed land use standards” and “self-use” and made the following adjustment: adding in the provision that exemption from farmland occupation tax is allowed for the farmland occupied for the newly-built house not exceeding the original house site area;
 - Delete “widowers, widows, orphans and childless elderly couples” and add in the “dependents of those servicemen who have sacrificed in action”;
 - Modify “farm village residents in old revolution areas, ethnic minority areas and remote mountain areas who have livelihood difficulties” as “rural residents that meet the minimum living security conditions in rural areas”.

For military facilities, social welfare organizations, and medical institutions exempted from the farmland occupation tax and highway lines eligible for tax reduction, implement the policies by referring to the Announcement on Matters Relating to Collection Administration of Farmland Occupation Tax (Announcement of the State Taxation Administration [2019] No. 30).

⑤ Land with farmland occupation tax already paid used for tax exemption projects

Taxpayers may handle the situation in two steps: conversion of agricultural land and land supply. In the conversion of agricultural land, where the land use applicant can prove that the construction land user satisfies the requirements on tax exemption as stipulated in Clause (1) of Article 7 in the Farmland Occupation Law, the land use applicant shall be exempted from the farmland occupation tax. In the land supply step, where the construction land user uses the farmland for the purposes which satisfy the requirements on tax exemption as stipulated in Clause (1) of Article 7 in the Farmland Occupation Law, the land use applicant and the construction land user shall jointly apply for refund of farmland occupation tax, which has already been paid by the land use applicant, pursuant to provisions on tax rebate management.

⑥ Temporary farmland occupation

The original regulation is “Upon reinstatement of the original conditions of the occupied farmland by the taxpayers within the period when temporary occupation of farmland is approved, the farmland occupation tax paid shall be refunded in full”. In this new Law, the “period” is modified as “within one year from the date of approval of temporary occupation of farmland”. In addition, the Law changed the condition of tax refund from “reinstatement of the original conditions of the occupied farmland” to “reclaim land in accordance with this Law and restore crop growing conditions”.



5. China-Japan Social Security Protocol Came into Effect

In order to address the issue of double payment of social insurance by workers with citizenship and subject to the laws and jurisdiction of one Contracting State working in the other Contracting state, China and Japan officially entered into the Social Security Protocol Between the Government of the People's Republic of China and the Government of Japan on May 9, 2018. The protocol came into effect on September 1, 2019 and the main content is as follows:

Article	Main content
Coverage of mutual exemption	China: Basic pension for employees
	Japan: National annuity (except for national annuity fund) and welfare pension (except for welfare pension fund)
Chinese personnel eligible	Dispatched employees, employees in ocean-going vessels, employees in aircrafts, personnel in embassies, civil servants, specific personnel, trailing spouses and children
Japanese personnel eligible	Dispatched employees, employees in ocean-going vessels, employees in aircrafts, personnel in embassies, civil servants and specific personnel
Period for exemption	The maximum period for the first application for exemption by dispatched employees is 5 years (Where the period of dispatching exceeds 5 years, it may be extended upon approval of competent authorities or agencies in charge of both states.)
Competent authorities	China: Ministry of Human Resources and Social Security of the People's Republic of China
	Japan: Any government organs in charge of national annuity (except for national annuity fund) and welfare pension (except for welfare pension fund)
Agencies in charge	China: Social insurance administration center of the Ministry of Human Resources and Social Security (MOHRSS) or other agencies as designated by the MOHRSS
	Japan: Insurance agencies or associations thereof responsible for implementing the national annuity (except for national annuity fund) and welfare pension (except for welfare pension) system

Meanwhile, the administrative measures relating to social insurance exemption in accordance with the protocol and Social Insurance Payment Certificate (sample table) are also released in the Notice on Implementing China-Japan Social Security Protocol (Ren She Ting Fa [2019] No. 81).

6. Promulgation of the Implementation Rules for the Special Fund for Guiding Talent Development in Qianhai Shenzhen-Hong Kong Modern Service Industry Cooperation Zone of Shenzhen

To support Qianhai in developing a national experimental zone for talent management reform and a Shenzhen-Hong Kong Talent Special Zone so as to provide talent support for development and construction of Qianhai, Shenzhen released the Provisional Implementation Rules for the Special Fund for Guiding Talent



Development in Qianhai Shenzhen-Hong Kong Modern Service Industry Cooperation Zone of Shenzhen (Shen Qian Hai Gui [2018] No. 1). The main content is as follows:

① Individuals awarded include individuals receiving general support and other ones

Individuals receiving general support refer to individuals who have been working consecutively for more than six months for the following organizations registered and actually operating in Qianhai Cooperation Zone and have paid individual income tax in Qianhai (working time in different enterprises can be aggregated, except for work discontinuity):

(1) A legal person or a special non-corporate body that paid tax of no less than RMB500,000 in Qianhai Cooperation Zone in the previous year; or

(2) A legal person or a special non-corporate body that rents or purchases offices in Qianhai Cooperation Zone or is relatively controlled by a Hong Kong investor and paid tax of no less than RMB300,000 in Qianhai in the previous year.

Other individuals receiving support mentioned herein are individuals who satisfy any of the following two conditions and pay individual income tax in Qianhai:

(1) Individuals whose individual income tax on wages and salaries are withheld by enterprises, head offices of financial institutions and their first-tier holding subsidiaries, wholly-owned Hong Kong enterprises, listed enterprises and their first-tier holding subsidiaries registered in Qianhai Cooperation Zone that implement the long-term talent remuneration incentive plan for listed companies and have paid tax of no less than RMB5 million in Qianhai in the previous year.

(2) A natural person partner of an equity investment limited partnership enterprise registered in Qianhai Cooperation Zone who obtains income from such partnership enterprise and pays individual income tax in Qianhai in accordance with the laws and regulations for income from production and business operations of individual businesses or income from interest, dividends and bonuses. To be specific, the paid-in capital of the limited partnership enterprise shall be no less than RMB50 million, and the capital contribution of the natural person partner shall be no less than RMB5 million.

② Application

Generally speaking, for individuals who satisfy the provisions of these Rules, their employers or the withholding agent may file applications for the fund for guiding talent development on an annual basis. Where a person satisfies the application conditions in the previous year but has left his/her former employer at the time of application and no longer works in Qianhai Cooperation Zone or does not work for any other employer that meets the application conditions in the Zone, he/she shall not apply for this fund; where a person satisfies the application conditions in the previous year has left his/her former employer at the time of application but works for any other employer that meets the application conditions in Qianhai Cooperation Zone, the new employer may apply for this fund on his/her behalf. In the case that the new employer refuses to submit the application or does not intend to submit the application, the person may submit the application by him/herself.



③ Incentive criteria

Direct economic contribution to Qianhai in the previous year	Talent development fund granted
RMB30,000 ~ RMB100,000	RMB6,000 ~ RMB20,000
RMB100,000 ~ RMB200,000	RMB25,000 ~ RMB50,000
RMB200,000 ~ RMB500,000	RMB60,000 ~ RMB150,000
RMB500,000 ~ RMB1,000,000	RMB175,000 ~ RMB350,000
RMB1,000,000 ~ RMB12,500,000	RMB400,000 ~ RMB5,000,000
Over RMB12.5 million and the tax payment by the withholding agent in Qianhai for the previous year was no less than RMB20 million	RMB5,000,000 ~ RMB10,000,000

④ Tax payment

After issuing a fund use plan, the Authority of Qianhai shall uniformly appropriate the funds for guiding talent development to the account of a declarer, which shall withhold individual income tax under the item of "Contingent income". Upon receipt of the appropriated funds, the declarer shall disburse the fund to the persons listed in the fund support plan within one month.



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