

# Corporate Restructuring in Mainland China

Programme Code: SCPD20021201

## About the topic

In 2009, The State Taxation Administration (STA) issued circular Guoshuihan [2009] No. 698 (Circular 698) to combat abusive use of corporate structure in indirect equity transfer transactions of China tax resident enterprises. In February 2015, the STA released a Public Notice [2015] No. 7 (PN 7) to supersede the rules in Circular 698. Though PN 7 was issued over 4 years ago, there are still uncertainties in the actual applications of the PN 7 provisions. Apart from indirect equity transfer, there are also issues arising from the different corporate restructurings in China, e.g. the special reorganization treatments on the direct transfer, tax treaty applicability of the cross-border transactions, adopted valuation methodology etc.

In this seminar, the speakers will cover the following tax and valuation topics in relation to corporate restructuring in Mainland China :

- Latest interpretations of certain PN 7 provisions;
- corporate income tax implications for corporate restructuring;
- application of tax treaty protection for cross-border transactions;
- case sharing including domestic/cross border direct/indirect transfer; merger, spin-off and etc.;
- statutory and advisory valuation in China; and
- different valuation methodologies with case sharing on method selection based on different circumstantial factors.

## About the event

**Date & Time** 12 February 2020, Wednesday  
7:00 – 8:30 pm

**Venue** HKICPA training centre,  
27th Floor, Wu Chung House,  
213 Queen's Road East, Wanchai

**Fee**

- Taxation Faculty member: HK\$120
- HKICPA member or student; and IA/ HKIAAT's member or student: HK\$150
- Non-member: HK\$330

*Not a faculty member? Click [here](#) to join.*

**Language** Cantonese

**HKICPA CPD credit** 1.5 hour (subject to actual attendance)

**Rating** Advanced level\*

**Competency** Taxation\*

**Application deadline** 9 February 2020

### Speakers

#### Shanice Siu

Member of Institute's China Tax Subcommittee, and Tax Partner, Deloitte China

#### Necker Kwok

Partner, Valuation & Modeling, Deloitte China

#### Tony Yao

Tax Director, Deloitte China

\* Please refer [here](#) for descriptions of the various ratings.



## About the speakers

### **Shanice Siu**

#### **Member of Institute's China Tax Subcommittee, and Tax Partner, Deloitte China**

Shanice is the International Tax Partner in Deloitte's Southern China office. She has extensive professional experience in the field of China, Hong Kong and international tax advisory service for over 20 years. She provides tax consulting services, including tax planning for group re-organization and corporate restructuring, to international corporations with investments in Hong Kong and China, as well as the Chinese corporation with outbound investments in different countries. She has served a variety of clients across different industries including the multinational enterprises in technology, real estate, consumer product sectors and so on.

Shanice is a fellow member of HKICPA. She is also a fellow member and registered Certified Tax Advisor with the Taxation Institute of Hong Kong.

She is the author of the published articles for the professional journals and she has been invited as the speaker for the professional body, commercial chamber and educational institutes on a regular basis.

### **Necker Kwok**

#### **Partner, Valuation & Modeling, Deloitte China**

Necker is a Partner of Valuation & Modelling in Shenzhen. He joined Deloitte Hong Kong in July 2008 and has over 16 years experience in performing business and equity valuation in Hong Kong, China and Australia. He has performed independent valuations for fund investment portfolio, mergers and acquisitions, internal reference and financial reporting purposes.

His industry experience includes investment management, infrastructure, high technology, media and telecommunications, financial institutions, software, retails and manufacturing, etc. Necker also spent a few years in providing third party equity research to investment industry, clients included many top-tier global financial institutions.

Necker is a member of CPA Australia.

### **Tony Yao**

#### **Tax Director, Deloitte China**

Tony is the Tax Director of Deloitte Tax Controversy Team and has more than 20 years of experience in tax administration and tax advisory. He has assisted many large enterprises to resolve disputes with tax authorities and obtain understanding/support from the authorities, including tax audit defense, outbound remittance, mergers and acquisitions, tax preference, tax refund, etc.

Before joining Deloitte, Tony has been working in Shenzhen Tax Bureau for 17 years. Tony has extensive experience in tax policy, tax administration of large enterprises, transfer pricing and international tax. Tony also participated in the expert groups organized by STA and Guangdong Tax Bureau, and has a good relationship network with STA and the major Tax Bureaus in Southern China.

## Registration

- Complete online registration [by 9 February 2020](#). **Contact Betsy Liang at 2287 7009 for enquiry.**



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37/F, Wu Chung House, 213 Queen's Road East, Hong Kong

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e-mail: [finance@hkicpa.org.hk](mailto:finance@hkicpa.org.hk)  
Fax: 2893 9853

Event Information Enquiry:  
2287 7009  
e-mail: [betsyliang@hkicpa.org.hk](mailto:betsyliang@hkicpa.org.hk)

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Seq. no.: \_\_\_\_\_

**Deadline: 9 February 2020**

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