



# MOORE

Tax Services

## HONG KONG TAX



At Moore Stephens, we help you flourish in a changing world.

Facing a fast changing global tax environment, companies always encounter new and unknown challenges. Compliance requirement may change, previous tax plans may no longer be valid. How could we maintain peace of mind? Our experienced tax professionals in Hong Kong anticipate and manage tax risk before it becomes a challenge. We aim at creating value to your business and provide bespoke solutions to maximise your tax benefits.

### Our tax services

#### Presence in Hong Kong

##### Setting Up

- Assist in selecting a tax efficient structure to establish presence in Hong Kong
- Advise on the tax implications and compliance requirements on the chosen structure

##### Tax Compliance

We assist clients to prepare and perform various tax filings including:

- Profits Tax Return
- Employer's Return
- Property Tax Return
- Holdover applications, objections, enquiry letters, ad hoc tax advice and tax investigations

#### Corporate Tax Review and Planning

##### IPO Tax Planning

- Are you tax ready for an IPO?
- Is the IPO structure tax efficient?
- What are the tax implications in group restructuring?
- Is there tax planning opportunity for founders and key management?

##### Offshore Claims Review

Hong Kong adopts a territorial source principle of taxation, only profits sourced in Hong Kong are taxable here.

We assist you to ascertain the possibility to apply for offshore claim exemption.

##### Withholding Obligations

We assist to review if you have withholding obligations (for example, on royalty payment) and advise on the related issues.

##### Corporate Treasury Centre

Increasing multinational companies are considering to establish Corporate Treasury Centres (CTCs) in Hong Kong.

We assist CTCs to ascertain the possibility to meet the criteria for concessionary tax rate.

##### Tax Health Check

We perform tax compliance review on companies / individuals and identify potential tax exposure and areas for improvement.

## Merger and Acquisition

### Pre-acquisition

- Perform tax due diligence review for buyer / vendor
- Provide tax advice on deal structure

### Post-acquisition

- Perform detailed tax review on the company
- Assist in resolving the tax issues identified

## Obtaining Certificate of Tax Residency

Hong Kong resident (company or individual) may need to obtain a Certificate of Tax Residency (COR) from the Inland Revenue Department to prove the resident status for purposes of claiming tax benefits under a Double Tax Agreement/Arrangement.

- How likely could you obtain a COR?
- We assist you in ascertaining the possibility of obtaining a COR and assist in application of the COR.

## Common Reporting Standard / Automatic Exchange of Financial Account Information

Common Reporting Standard (CRS) is a standard endorsed in September 2014 for Organisation for Economic Cooperation and Development (OECD) members to implement under Automatic Exchange of Financial Account Information (AEOI).

AEOI is a new system that involves the transmission of financial account information from Hong Kong to an overseas tax jurisdiction with which Hong Kong has entered into an AEOI agreement and vice versa.

Over 100 jurisdictions have committed to an annual automatic exchange of financial account information from 2017 or from 2018 onwards under CRS.

- Are you affected under CRS/AEOI?
- Would your corporate bank account / individual bank account information be exchanged with another jurisdiction?
- What would be the tax implications if information is exchanged?

We assist you to find out your CRS/AEOI exposure.

## Individual Tax Review and Planning

### International Assignment / Salaries Tax Planning

- Assist in remuneration / benefits planning for individuals
- Handle post-arrival and pre-departure formalities including a tax briefing upon arrival in and before departure from Hong Kong
- Advise on tax equalisation calculations on cross border assignments
- Prepare and file salaries tax returns, tax exemptions and related matters



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