

HONG KONG TAX



At Moore, 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 (CRS) / Automatic Exchange of Financial Account Information (AEOI)

From 2017 or 2018 onwards, over 100 jurisdictions globally have committed to an annual automatic exchange of financial account information 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 financial 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



Winnie Tsui
Tax Director

T +852 2738 7715
E winnietsyui@moore.hk

Loren Chan
Tax Director

T +852 2738 7734
E lorenchan@moore.hk

Cecilia Hung
Tax Director

T +852 2738 7797
E ceciliahung@moore.hk



www.moore.hk