



Hong Kong Institute of
Certified Public Accountants
香港會計師公會

Meeting notes

**Guangdong Provincial Tax Service, State Taxation
Administration**

and

The Hong Kong Institute of Certified Public Accountants

2019

Foreword

It is a great honor for the Hong Kong Institute of Certified Public Accountants (“Institute” or “HKICPA”) to hold the meeting with the Guangdong Provincial Tax Service, State Taxation Administration (“GDSTA”) on 13 December 2019 in Guangdong. The meeting aims to discuss various taxation topics and to exchange opinions based on the discussion.

The following is a translation of the meeting notes prepared, in Chinese, by the Institute. Please note that the meeting notes merely represent the views of GDSTA officials who attended the meeting and are not intended to be legally-binding or a definitive interpretation. Professional advice should be sought before applying the contents of these notes to your particular situation.

HKICPA wishes to thank the delegates from Grant Thornton for taking the meeting notes.

Summary note

Agenda items

A. Value-added tax (“VAT”)

1. Trademark used overseas
2. Impact of new accounting standards on VAT
3. VAT issues facing commercial factoring companies
4. VAT deduction for real estates

B. Corporate Restructuring

1. Indirect equity transfer between non-resident enterprises settled by instalments
2. Whether the special tax treatment for corporate restructuring applies to capital reduction
3. Corporate separation
4. Questions on STA Public Notice [2015] No.7

C. Determination of beneficial owner

1. Determination of “beneficial owners” status of treaty benefit applicants

D. Individual Income tax (“IIT”)

1. The Greater Bay Area (“GBA”)
2. IIT subsidy policies in the GBA
3. General IIT issues

E. Others

1. Asset restructuring and reorganization
2. Caishui [2019] No.8: Income tax issues on individual partners of venture capital enterprises