



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

# Meeting notes

**Shenzhen 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 Shenzhen Tax Service, State Taxation Administration (“SZSTA”) on 13 December 2019 in Shenzhen. 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 SZSTA 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 the new accounting standards on VAT
3. VAT issues facing commercial factoring companies

#### **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 (“PN7”)

#### **C. Determination of beneficial ownership**

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

#### **D. Individual Income tax (“IIT”)**

1. General IIT issues

#### **E. Others**

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