

# Migrating to Hong Kong: Hong Kong Government introduces amendment bill for company re-domiciliation regime

6 January 2025  
Issue 1

---

## In brief

---

Following the consultation conclusion published by the Financial Services and Treasury Bureau in July 2024, the legislative bill to introduce an inward company re-domiciliation regime (Bill)<sup>1</sup> was gazetted on 20 December 2024. In brief, the Bill seeks to amend the Companies Ordinance (Cap. 622) (CO) to introduce an inward company re-domiciliation regime, which will enable a non-Hong Kong company to transfer its domicile (i.e. essentially place of incorporation) to Hong Kong while maintaining its legal identity. The policy intention is to create a comparatively simple and cost-effective route for overseas companies to re-register their place of incorporation to Hong Kong instead of winding-up the existing company in the original domicile and then incorporating a new Hong Kong company (along with any business/asset transfer that might otherwise be required). Upon re-domiciliation, the re-domiciled company will be required to comply with the same relevant requirements as other locally-incorporated companies under the amended CO.

In conjunction with the proposed changes to the CO, the Bill proposes to amend, amongst various other ordinances, the Inland Revenue Ordinance (IRO), such as adding a new schedule to outline the tax treatments for re-domiciled companies that have not carried on a trade, profession or business in Hong Kong prior to re-domiciliation. These include provisions for transitional tax matters and unilateral tax credits to facilitate a tax-neutral re-domiciliation process, thereby providing re-domiciled companies with greater degree of certainty concerning their tax liabilities and obligations in Hong Kong.

It is noteworthy that the Bill has included specific provisions to address key tax issues of concern to stakeholders and provides much-needed certainty. Specifically, a re-domiciled company, with the exception of an airline, will be regarded as a company incorporated in Hong Kong for purposes of Hong Kong laws, including the IRO. Consequently, it will generally qualify as a Hong Kong tax resident under most tax treaties signed by Hong Kong and other jurisdictions. Additionally, no stamp duty liabilities will arise from the re-domiciliation process.

The Inland Revenue Department (IRD) has also published online guidance with illustrative examples to explain the tax aspects of the Bill<sup>2</sup>.

This news flash summaries the salient provisions of the Bill with focus on the tax-related provisions and our observations thereon.

---

## In detail

---

### Background

The Government is committed to attracting enterprises and investment to bolster Hong Kong's status as a global business and financial hub. Building on the positive experience gained from the fund re-domiciliation mechanisms, the Government plans to establish a more comprehensive legal framework that provides a simple and straightforward route for non-Hong Kong companies to re-domicile to Hong Kong.

Following a two-month public consultation and the release of the consultation conclusion as discussed in our previous news flashes<sup>3</sup>, the Bill was gazetted on 20 December 2024 to amend the CO to introduce an inward company re-domiciliation regime, which will enable a non-Hong Kong company to re-domicile to Hong Kong.

Under the proposed mechanism outlined in the Bill, the fundamental requirement is that the original domicile<sup>4</sup> (Original Domicile) of the applicant must permit an outward re-domiciliation to another jurisdiction. For instance, both the British Virgin Islands and the Cayman Islands permit outward re-domiciliation. On the other hand, Bermuda only permits outward re-domiciliation to 'appointed jurisdictions' (which currently do not include Hong Kong) or a jurisdiction approved by the Minister of Finance upon application by an exempted company. It remains to be confirmed if Bermuda will add Hong Kong to its list of appointed jurisdictions subsequent to the enactment of the Bill.

Additionally, the applicant must be one of the specified types of companies under the CO, as well as meet the specified criteria in relation to integrity, member and creditor protection and solvency. The legislative intention of the Bill is that the re-domiciliation will not create a new legal entity, and will not affect the pre-existing properties, rights, obligations and liabilities, employment relationships as well as the relevant contractual and legal processes of re-domiciled companies. Upon re-domiciliation, re-domiciled companies can maintain their legal identities as bodies corporate, ensuring business continuity. They will generally have the same rights as any Hong Kong-incorporated companies and will be required to comply with the relevant requirements under the amended CO as other locally-incorporated companies. For example, a re-domiciled company will need to appoint a company secretary under the amended CO, a requirement that may not have been necessary prior to its re-domiciliation to Hong Kong.

Importantly, there will be no economic substance test applied to the re-domiciled companies. In other words, companies fulfilling the above specified requirements will be eligible for the proposed re-domiciliation arrangement in Hong Kong regardless of their scale. For details of the specified criteria, please refer to the Appendix to this news flash.

## Proposed tax treatments for re-domiciled companies

### 1. Tax residency of re-domiciled companies

A key policy objective of the Bill is to ensure that a re-domiciled company is treated, for the purposes of Hong Kong laws, in the same manner as a Hong Kong-incorporated company from its re-domiciliation date<sup>5</sup>. To achieve this policy intent, a general interpretation provision will be introduced into the IRO, stipulating that a reference to a company 'incorporated in Hong Kong' will include a re-domiciled company.

In most tax treaties signed by Hong Kong, a Hong Kong tax resident is defined to mean, among others, a company incorporated in Hong Kong. The new general interpretation provision will enable a re-domiciled company to be regarded as a Hong Kong tax resident under these tax treaties, thereby potentially benefitting from these tax treaties.

**Our observations:** *We welcome the approach adopted by the Government. However, it is important to note that the term 'company incorporated in Hong Kong' is not defined in the tax treaties. In general, any term not defined in a tax treaty should be interpreted according to the meaning that it has under the applicable laws of Hong Kong at the time of the application of the relevant tax treaty, unless the context otherwise requires. Therefore, while the amendment provides legal basis for treating a re-domiciled company as a 'company incorporated in Hong Kong' and hence a Hong Kong tax resident for the purpose of the tax treaties, there may still be uncertainty as to whether the respective treaty partners will recognise the same and also the applicable period for enjoying the tax treaty benefits.*

*Since June 2023, the IRD has implemented a more efficient process for issuing Certificates of Residence (CoR) to Hong Kong incorporated companies. Under most tax treaties, this streamlined procedure requires Hong Kong incorporated companies to provide only basic information about their business particulars, thereby eliminating the need for detailed disclosures concerning their establishment and operational substance both within and outside of Hong Kong. Conceivably, subject to the further clarifications by the IRD, this streamlined process for issuing CoRs may equally apply to re-domiciled companies.*

*Nonetheless, being a Hong Kong tax resident, as evidenced by a CoR, is only one of the qualifying conditions for claiming tax benefits under a tax treaty. The entitlement to treaty benefits is subject to other conditions, including anti-abuse rules such as the beneficial ownership requirement for passive income and the principal purpose test. Ultimately, the decision to grant a treaty benefit rests with the treaty partner.*

*Similarly, the proposed approach intends to ensure that a re-domiciled company will be regarded as a tax resident in Hong Kong and, accordingly, located in Hong Kong for purposes of the proposed legislation to enact the Organisation for Economic Co-operation and Development's (OECD) global anti-base erosion (GloBE) rules and the proposed Hong*

*Kong minimum top-up tax (HKMTT)<sup>6</sup>. It is hoped that foreign jurisdictions adopting the GloBE rules will respect Hong Kong's interpretation.*

## 2. Proposed profits tax treatments for transitional tax matters

In general, the re-domiciliation process should not affect the Hong Kong profits tax liabilities of re-domiciled companies, as the determination of such liabilities does not depend on the domicile of a company, but on whether the company has Hong Kong sourced profits from its trade, profession or business carried on in Hong Kong. If a company has already been conducting business in Hong Kong, the re-domiciliation process will not alter its existing tax liabilities and obligations in Hong Kong.

Nonetheless, to provide tax certainty to re-domiciled companies that have never carried on any trade, profession or business in Hong Kong, the proposed new schedule to the IRO under the Bill sets out the tax treatments for certain specific and transitional tax matters for such companies.

In general, the proposed new schedule only applies to re-domiciled companies that meet the following criteria:

- (i) no business was carried on in Hong Kong before the re-domiciliation date;
- (ii) no tax deduction or relief has been claimed in respect of the expenditure in and outside of Hong Kong; and
- (iii) the relevant asset or right is used for a business in Hong Kong on or after the re-domiciliation date.

Subject to the above criteria, the proposed tax treatments for transitional tax matters are summarised below:

Transitional tax matters	Proposed tax treatments
<b>Expense incurred before the re-domiciliation date</b>	<ul style="list-style-type: none"> <li>• Subject to the deduction rules under the IRO, the expense is deductible to the extent that it was incurred in producing profits chargeable to profits tax.</li> </ul>
<b>Trading stock</b>	<ul style="list-style-type: none"> <li>• The cost of the trading stock is the lower of               <ul style="list-style-type: none"> <li>(i) the cost incurred in acquiring the trading stock; and</li> <li>(ii) the net realisable value of the trading stock on the re-domiciliation date.</li> </ul> </li> </ul>
<b>Expenditure incurred on (i) registration of intellectual property (IP) rights; or (ii) building refurbishment</b>	<ul style="list-style-type: none"> <li>• The expenditure is deemed to have been incurred by the re-domiciled company in the year of assessment when the re-domiciled company begins to use the relevant asset or right for a business carried on in Hong Kong.</li> </ul>
<b>Expenditure in relation to research and development (R&amp;D) activity</b>	<ul style="list-style-type: none"> <li>• The expenditure is deemed to have been incurred by the re-domiciled company in the year of assessment when the R&amp;D activity becomes (or becomes also) an R&amp;D activity related to a business carried on in Hong Kong.</li> </ul>
<b>Expenditure on (i) purchase of certain IP rights (ii) provision of prescribed fixed assets; or (iii) provision of environmental protection facilities</b>	<ul style="list-style-type: none"> <li>• The expenditure is deemed to have been incurred by the re-domiciled company in the year of assessment when the re-domiciled company begins to use the relevant asset or right for a business carried on in Hong Kong.</li> <li>• The expenditure deemed to have been incurred for this purpose is the lower of               <ul style="list-style-type: none"> <li>(i) the actual expenditure minus the accumulated amortisation and impairment losses in respect of the relevant asset or right up to the re-domiciliation date; and</li> <li>(ii) the market value of the relevant asset or right on the re-domiciliation date.</li> </ul> </li> </ul>
<b>Depreciation allowances on machinery or plant</b>	<ul style="list-style-type: none"> <li>• The expenditure is deemed to have been incurred by the re-domiciled company in the year of assessment when the re-domiciled company begins to use the relevant asset for a business carried on in Hong Kong.</li> <li>• Generally, the expenditure deemed to have been incurred for calculating depreciation allowances is the lower of               <ul style="list-style-type: none"> <li>(i) the actual cost minus the notional annual allowance that would have been made if the relevant asset had been used by the company for producing profits chargeable to profits tax since its acquisition; and</li> <li>(ii) the market value of the relevant asset on the re-domiciliation date.</li> </ul> </li> <li>• Special rules will apply if the relevant asset is acquired under a hire purchase agreement.</li> </ul>

**Our observations:** For non-Hong Kong IP holding companies contemplating the transfer of their IP to another group company due to commercial reasons or recent changes in international tax rules, re-domiciliation to Hong Kong could present a more advantageous option compared to a direct transfer of the IP to a Hong Kong group company. The key benefit of re-domiciliation is the potential for deducting capital costs in respect of the IP. Additionally, with Hong Kong's recent introduction of a patent box regime related to the holding and development of IP based on the nexus approach, re-domiciliation provides an added benefit for aligning the holding structure with the location of R&D activities.

In the absence of specific provisions regarding the tax treatments of bad debts and impairment losses for debts, the existing rules should apply. In other words, any provision for bad debts or impairment losses made before the re-domiciliation date and written off on or after that date should not be deductible. By the same token, any recovery of such bad debts or reversal of the impairment loss on or after re-domiciliation should not be taxable.

### 3. Unilateral tax credits

Where a re-domiciled company has paid tax in the Original Domicile which is of substantially the same nature as profits tax on its unrealised profits upon re-domiciliation to Hong Kong (commonly known as 'exit tax'), and its actual similar profits are also taxed in Hong Kong, unilateral tax credits will be provided to the re-domiciled company to eliminate double taxation.

The unilateral tax credits under the proposed re-domiciliation regime are subject to certain conditions/requirements similar to those applicable to the existing bilateral tax credits under tax treaties and unilateral tax credits under the foreign-sourced income exemption (FSIE) regime. These include restricting the amount of allowable tax credit to the lower of (i) the amount of foreign tax paid and (ii) the amount of Hong Kong profits tax payable on the actual similar profits subject to double taxation, the time limit for making the tax credit claim, and the requirement to take foreign tax minimisation steps, etc.

Notably, any excess amount of the foreign tax paid over the tax credit limit will be allowed as a tax deduction in ascertaining the assessable profits of the re-domiciled company.

**Our observations:** We are pleased that the Government has adopted our recommendation to allow a unilateral tax credit for the exit tax paid in the Original Domicile against the Hong Kong profits tax payable, irrespective of whether Hong Kong has signed a tax treaty with the Original Domicile. This is likely to be attractive to those companies contemplating re-domiciliation to Hong Kong from an Original Domicile that imposes an exit tax and has not signed a tax treaty with Hong Kong, as it mitigates the potential tax burden associated with the move.

As illustrated in the examples provided in the IRD's online guidance, the unilateral tax credits under the proposed re-domiciliation regime may provide additional tax relief beyond the full elimination of double taxation. This tax treatment differs from the existing bilateral tax credits under tax treaties and unilateral tax credits under the FSIE regime, which effectively only provide tax relief up to full elimination of double taxation. This additional benefit may serve as an incentive for non-Hong Kong incorporated companies to re-domicile to Hong Kong.

### 4. Insurance businesses

Supplementary provisions are introduced under the proposed new schedule, along with amendments to the relevant sections of the IRO governing the taxation of insurers (e.g. section 23, section 23AAA). These amendments address the calculation of 'adjusted surplus' for re-domiciled insurers that elect to be taxed under this basis. However, these provisions should not affect re-domiciled insurers, who have been carrying on the majority of its life and/or non-life long term insurance business in or from Hong Kong before re-domiciliation.

## Hong Kong stamp duty implications

### 1. No stamp duty implications upon re-domiciliation

The Bill contains a provision under the CO specifying that for tax purposes, the re-domiciliation does not have the effect of transferring any assets of the body corporate or changing the beneficial ownership of any of those assets. This provision unequivocally clarifies that no stamp duty liabilities will arise from the re-domiciliation process.

### 2. Subsequent transfer of shares in a re-domiciled company subject to stamp duty

Same as a Hong Kong incorporated company, the transfer of shares in a re-domiciled company is required to be registered in Hong Kong upon re-domiciliation. That means that such shares will fall within the definition of 'Hong Kong

stock', implying that the transfer of such shares will attract stamp duty. Consequently, no amendments to the Stamp Duty Ordinance are required.

## **Proposed procedures for re-domiciliation application**

### **1. General procedures**

Application for re-domiciliation should be submitted to the Registrar of Companies (R of C) with the required documents and application fee. The Government has indicated that the R of C will generally approve an application within two weeks upon receipt of all the required documents. Please refer to Annex C to the Legislative Council brief for the complete list of documents and fees for a re-domiciliation application.

If the R of C determines that the applicant meets all the requirements for registration as a re-domiciled company, the R of C will approve the application and register the applicant as a re-domiciled company. The R of C will issue a certificate of re-domiciliation to the company and the re-domiciliation to Hong Kong will take effect on the date the certificate is issued. The company will then be required to de-register from the Original Domicile and provide evidence of the de-registration to the R of C within 120 days to complete the re-domiciliation process. The company may apply for an extension if needed.

Upon fulfilment of the deregistration requirements, the re-domiciliation procedure is completed. A re-domiciled company must deliver to the R of C within 15 days after the re-domiciliation date a specified form including a statement of share capital and particulars of its members. If a re-domiciled company does not meet the deregistration requirements, the R of C can, after allowing the company to present written representations, revoke its registration. When registration is revoked, the company reverts to being a non-Hong Kong incorporated company.

### **2. Facilitative arrangements for companies with existing business in Hong Kong**

A re-domiciled company that was registered under Part 16 of the CO as a non-Hong Kong company with a business presence in Hong Kong prior to re-domiciliation will be allowed to retain its corporate or approved name in Hong Kong and business registration number to continue operations seamlessly. Consequentially, the Part 16 registration shall cease once the applicant becomes a re-domiciled company.

There are also transitional provisions clarifying that any outstanding obligations of a registered non-Hong Kong company must still be fulfilled even after re-domiciliation to ensure the completeness of the company's records.

### **3. Special arrangements for authorised financial institutions and insurers**

The Bill proposes amendments to the Insurance Ordinance and Banking Ordinance, stipulating that an authorised financial institution or insurer incorporated outside Hong Kong that has been registered by the R of C, will only be treated as if it were incorporated in Hong Kong upon fulfilling the deregistration requirements, rather than upon the issuance of a certificate of re-domiciliation by the R of C. This measure aims to prevent regulatory treatment changes within a short period should the entity fail to meet deregistration requirements and have its re-domiciliation revoked.

Additionally, these entities must consult with the relevant Hong Kong regulatory authority (i.e. the Insurance Authority or the Hong Kong Monetary Authority) to assess their ability to meet applicable requirements before applying for re-domiciliation with the R of C.

## **Legislative timeline**

The Bill will be introduced into the Legislative Council for first reading and second reading on 8 January 2025. The proposed regime will become effective immediately upon the enactment of the bill into law.

It is anticipated that the R of C will handle re-domiciliation applications upon enactment of the Bill.

---

## The takeaway

---

The introduction of the re-domiciliation regime will further solidify Hong Kong's status as an international business and financial hub, making it more attractive to various companies, particularly those:

- (i) seeking a favourable business environment while retaining their legal identities;
- (ii) aiming to align their corporate domicile with their primary place of commercial significance; and/or
- (iii) looking to relocate their IP/other asset holding, rationalise their legal entities or otherwise restructure in light of the international tax developments (e.g. the GloBE rules, and relevant substance requirements, whether in no or only nominal tax jurisdictions or other jurisdictions, including those necessary for enjoying treaty benefits).

In addition to the legal and tax considerations in the Original Domicile and Hong Kong, there may be tax implications in other jurisdictions where the company has a nexus, such as owning assets or underlying subsidiaries in those jurisdictions. Some jurisdictions impose a tax on the offshore direct or indirect transfer of assets or shares by non-resident entities. While no transfer of assets or shares occurs in the context of re-domiciliation from a Hong Kong tax and legal perspective, companies should consider obtaining confirmation as to whether the contemplated re-domiciliation will be construed as a disposal of assets or shares in the underlying subsidiaries, and to assess the potential foreign tax exposures, foreign legal obligations and related reporting obligations, if any.

With Hong Kong set to implement the Income Inclusion Rule under the GloBE rules and the HKMTT starting in 2025, it is imperative for large multinational enterprise (MNE) groups within the scope to carefully evaluate how these new rules will impact constituent entities that plan to re-domicile to Hong Kong.

Given the complexity of these matters, companies are advised to seek guidance from our dedicated team of specialists in tax, legal and corporate services. With our extensive global network, we can help explore the potential benefits and assist in early preparation, enabling prompt action once the regime is implemented.

---

## Endnotes

---

1. The Bill and the Legislative Council brief can be accessed via these links:  
<https://www.legco.gov.hk/yr2024/english/bills/b202412201.pdf>  
[https://www.legco.gov.hk/yr2024/english/brief/co23c\\_20241219-e.pdf](https://www.legco.gov.hk/yr2024/english/brief/co23c_20241219-e.pdf)
2. The online guidance can be accessed via this link:  
[https://www.ird.gov.hk/eng/tax/bus\\_redomiciliation.htm](https://www.ird.gov.hk/eng/tax/bus_redomiciliation.htm)
3. Our news flashes on the public consultation and the consultation conclusion can be accessed via these links:  
<https://www.pwchk.com/en/hk-tax-news/2023q2/hongkongtax-news-jun2023-8.pdf>  
<https://www.pwchk.com/en/services/tax/publications/hongkongtax-news-jul2024-11.html>
4. 'Original domicile' refers to the jurisdiction outside Hong Kong in which the non-Hong Kong-incorporated company is incorporated, or in the case where the company has transferred its domicile to another jurisdiction since its incorporation, its latest domicile.
5. 'Re-domiciliation date' means the date on which a certificate of re-domiciliation is issued to the company.
6. A legislative bill to amend the IRO to implement the OECD's GloBE rules and the HKMTT was gazetted on 27 December 2024. The GloBE rules target MNE groups with annual consolidated revenue of at least EUR 750 million in two or more of the preceding four fiscal years, and ensure that these MNE groups pay a minimum tax of 15% in respect of the profits derived from every jurisdiction they operate in. Please refer to our news flash for the key features of the bill:  
<https://www.pwchk.com/en/hk-tax-news/2024q4/hongkongtax-news-dec2024-21.pdf>

## Appendix – Proposed application eligibility for company re-domiciliation to Hong Kong

The proposed re-domiciliation regime covers the following types of companies:

- (i) private companies limited by shares;
- (ii) public companies limited by shares;
- (iii) private unlimited companies with a share capital; and
- (iv) public unlimited companies with a share capital.

Non-Hong Kong companies applying for re-domiciliation to Hong Kong should fulfil the following requirements:

Eligibility criteria	
<b>General</b>	<ul style="list-style-type: none"> <li>• The law of the Original Domicile permits outward re-domiciliation, and the applicant has complied with the requirements of such laws.</li> <li>• The company type of the applicant under the law of the Original Domicile is (substantially) the same as that of the re-domiciled company under the amended CO.</li> <li>• As at the date of application for re-domiciliation, the applicant's first financial year end since its incorporation has passed.</li> </ul>
<b>Integrity</b>	<ul style="list-style-type: none"> <li>• The applicant shall comply with all the registration requirements applicable to Hong Kong companies under the amended CO including adoption of articles, registered office address in Hong Kong, resident company secretary and resident designated representative for maintaining a significant controllers register.</li> <li>• The re-domiciled company will not be used for unlawful purposes or purposes contrary to public interest.</li> </ul>
<b>Members' consent</b>	<ul style="list-style-type: none"> <li>• Application must be in good faith and not intended to defraud existing creditors of the company.</li> <li>• The company's re-domiciliation must be endorsed by members.</li> <li>• If neither the law of the Original Domicile nor the constitutional documents of the applicant requires members' consent, an applicant should obtain such consent by a resolution duly passed by at least 75% of eligible members. The resolution can be passed in a meeting or in written form.</li> </ul>
<b>Solvency</b>	<ul style="list-style-type: none"> <li>• An applicant must be solvent and not in liquidation. To demonstrate this, the applicant should submit the latest financial statements as at a date no more than 12 months prior to the application date.</li> <li>• The financial statements are required to be audited only if such have been prepared for compliance with the requirements in the Original Domicile, relevant stock exchange or regulatory bodies.</li> </ul>
<b>Proof of compliance in the Original Domicile</b>	<ul style="list-style-type: none"> <li>• An applicant should submit a legal opinion issued by a practising lawyer of the Original Domicile in relation to, among others, (1) the applicant's due registration in the Original Domicile, (2) company type and solvency, (3) permission of the proposed re-domiciliation under the law of the Original Domicile or the constitutional document of the applicant, (4) consent from members of the company for the proposed re-domiciliation, and (5) the intended re-domiciled company's type, name and adoption of the proposed articles of association.</li> </ul>

**Our observations:** For a company with a large number of members and no concentration of shareholding, if neither its Original Domicile nor its constitutional document requires members' consent, it may be challenging to obtain at least 75% of the eligible members' consent. Further, given the general 25% public float requirement under the Hong Kong Listing Rules, it is almost impossible for a non-Hong Kong applicant company with Hong Kong listing status to confirm in a re-domiciliation form that its proposed articles to be delivered to the R of C have been signed by each person who is to be a member of the

*applicant company on a date not earlier than 15 days before the application date. Accordingly, an applicant company may need to explore the feasibility of obtaining conditional authority resolutions under the law of the Original Domicile which will become unconditional once it becomes a re-domiciled company and seek independent legal advice. It is hoped that deeming provisions or further guidance from the Hong Kong Stock Exchange will be available upon enactment of the Bill.*

---

## Let's talk

---

For a deeper discussion of how this impacts your business, please contact:

### PwC's Corporate Tax Leaders based in Hong Kong

Jeremy Ngai  
+852 2289 5616  
[jeremy.cm.ngai@hk.pwc.com](mailto:jeremy.cm.ngai@hk.pwc.com)

Jeremy Choi  
+852 2289 3608  
[jeremy.choi@hk.pwc.com](mailto:jeremy.choi@hk.pwc.com)

Rex Ho  
+852 2289 3026  
[rex.ho@hk.pwc.com](mailto:rex.ho@hk.pwc.com)

Cecilia Lee  
+852 2289 5690  
[cecilia.sk.lee@hk.pwc.com](mailto:cecilia.sk.lee@hk.pwc.com)

Jenny Tsao  
+852 2289 3617  
[jenny.np.tsao@hk.pwc.com](mailto:jenny.np.tsao@hk.pwc.com)

Kenneth Wong  
+852 2289 3822  
[kenneth.wong@hk.pwc.com](mailto:kenneth.wong@hk.pwc.com)

### Corporate Services

Florence Lai  
+852 2289 1638  
[florence.lai@hk.pwc.com](mailto:florence.lai@hk.pwc.com)

Ivy Chow  
+852 2289 1609  
[ivy.yy.chow@hk.pwc.com](mailto:ivy.yy.chow@hk.pwc.com)

### Tiang & Partners\*

Joyce Tung  
+852 2833 4983  
[joyce.hs.tung@tiangandpartners.com](mailto:joyce.hs.tung@tiangandpartners.com)

Nicholas Cook  
+852 2833 4906  
[nicholas.cook@tiangandpartners.com](mailto:nicholas.cook@tiangandpartners.com)

\*Tiang & Partners is an independent Hong Kong law firm and a member of the PwC network





## One-stop tax information platform of Shui Jie 3.0 version Your exclusive tax think tank



- For Android users, please scan the QR code to access to Tencent App store
- Shui Jie web portal - <https://shuijie.pwconsultantssz.com>

In the context of this News Flash, China, Chinese mainland or the PRC refers to the People's Republic of China but excludes Hong Kong Special Administrative Region, Macao Special Administrative Region and Taiwan Region.

The information contained in this publication is for general guidance on matters of interest only and is not meant to be comprehensive. The application and impact of laws can vary widely based on the specific facts involved. Before taking any action, please ensure that you obtain advice specific to your circumstances from your usual PwC's client service team or your other tax advisers. The materials contained in this publication were assembled on 6 January 2025 and were based on the law enforceable and information available at that time.

This News Flash is issued by **PwC's National Tax Policy Services** in Chinese mainland and Hong Kong, which comprises a team of experienced professionals dedicated to monitoring, studying and analysing the existing and evolving policies in taxation and other business regulations in Chinese mainland, Hong Kong, Singapore and Taiwan. They support PwC's partners and staff in their provision of quality professional services to businesses and maintain thought-leadership by sharing knowledge with the relevant tax and other regulatory authorities, academics, business communities, professionals and other interested parties.

For more information, please contact:

Long Ma  
+86 (10) 6533 3103  
[long.ma@cn.pwc.com](mailto:long.ma@cn.pwc.com)

Charles Chan  
+852 2289 3651  
[charles.c.chan@hk.pwc.com](mailto:charles.c.chan@hk.pwc.com)

Please visit PwC's websites at <http://www.pwccn.com> (China Home) or <http://www.pwchk.com> (Hong Kong Home) for practical insights and professional solutions to current and emerging business issues.

# [www.pwchk.com](http://www.pwchk.com)

© 2025 PricewaterhouseCoopers Ltd. All rights reserved. PwC refers to the Hong Kong member firm, and may sometimes refer to the PwC network. Each member firm is a separate legal entity. Please see [www.pwc.com/structure](http://www.pwc.com/structure) for further details.