



2025

Capability Statement

# Why choosing WTS China?

WTS is a dedicated tax and finance consultancy firm. We concentrate all our efforts to help companies solve their problems, make sound decisions, execute business plans, and guide them through the ever-changing nexus of international and domestic tax regulations.

## What makes us unique?

- **Locally rooted, globally connected:** We are where you are.

WTS has been present since 2004 focusing on China tax practices. Our global network reaches over 100 countries and regions. Your tax matters, local or international, will be thoroughly addressed.

- **Practical solutions oriented:** We deliver actionable solutions.

With the strong expertise and abundant experience, we are able to grasp a fast understanding of the specific issues you are facing. We deliver solutions that you can take action and move forward.

WTS has introduced an AI tool globally (called “**plAIground**”).

- **Personally committed:** We are your partner, daily.

Our project leader is the single contact point for you. Our project teams are familiar with your business and know your expectations. All your questions, big or small, tax or finance, will be addressed to your satisfaction.

- **Economics are considered:** We charge reasonable fees.

Our fees are transparent and open. No surprises.




## Agenda


- 1 | Our services
- 2 | Team members
- 3 | About us
- 4 | Contact us

## International Tax & Permanent Establishments (ITP)


PE is an international taxation arrangement provided in double taxation avoidance agreements (DTAs) of each country. By virtue of a DTA, a business operated in China by a foreign company can be taxed by China tax authority for the PE created.


### Our strengths

- 

We have practical and rich knowledge in PE projects especially PE defense.
- 

We have handled many PEs in a wide range of industries.

  - Machinery production industry
  - Engineering industry
  - Energy industry
  - Special material industry
- 













We have a customized PE tool to monitor and track the progress of PE registration and tax compliance.
- 

We have issued many in-depth publications such as "Taxation of PE in China".

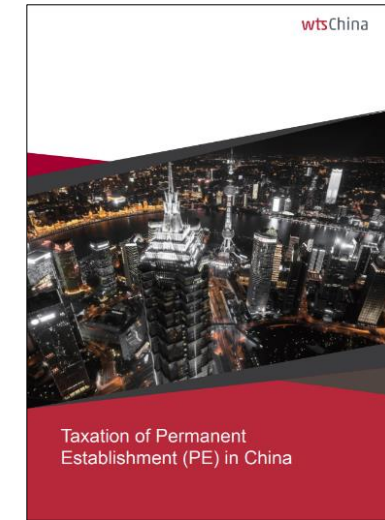
### What we do within ITP services

Project contract review	PE evaluation and mitigation advice	PE defense	PE handbook
PE registration	PE compliance service	PE de-registration	PE related cross-border payment advisory

### Our ITP service references (excerpt)

 Petro-chemical	 Infrastructure	 Installation	 Transport
 Medical	 Warehousing	 E-commerce	 Healthcare
 Communications	 Machinery	 Construction	 Storage

### ITP publications



\* [International Corporate Tax Newsletter](#)

\* [Taxation of Permanent Establishment \(PE\) in China](#)



# Global Mobility Services (GMS)

In time of globalization, the need of international employee deployment is growing. Companies are facing an increasing complexity of cross-border taxation, social security, legal and immigration-related requirements.

## Our strengths



In recent years, we have helped more than 15 multinational companies in their global expatriate assignment planning and compliance work.



We differentiate ourselves from the competitors with full-fledged global mobility services.



With WTS Global's coordination, we have constituted a global network with member firms over 100 countries. We can claim enforcement globally with the support from the global team.

## What we do within GMS

Tax planning

Design on tax equalization plans

Arrival / exit interviews

Visa and residence permits application

Review on employee assignment policies

Tax cost allocations

Payroll services

Compliance review / health check

## Our GMS service references (excerpt)



Consulting



Chain stores



After-sales



Transport



Tele-com



OEM



Packaging



Parts supply



Servicing



High-tech

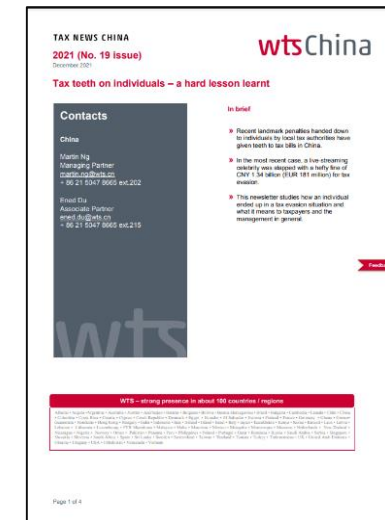
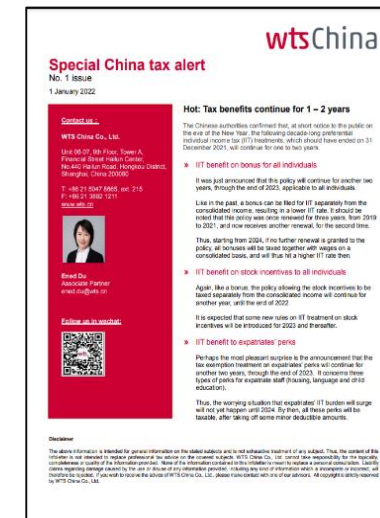


Sports



Transport

## GES publications



\* [Global Mobility Newsletter](#)

\* [Global Mobility Booklets "Asia Pacific, Americas and Europe"](#)

\* [Special China tax alert](#)

\* [Tax teeth on individuals – a hard learnt](#)

# Merger & Acquisition (M&A) Compliance

China is one of the biggest emerging market all over the world. M&A is an effective measure to access the Chinese market and new products, as well as to achieve greater market share. You should be aware of China tax issues related to M&A, if a Chinese company is involved.

## Our strengths



We have a team of renowned experts in the area of Chinese taxation with practical knowledge and rich experience on M&A projects.



We have served a number of multinational companies on M&A projects, and can respond immediately with practical solutions.



With the support of our global M&A teams, we can provide an integrated M&A concept feasible in all countries involved.

## What we do within M&A services

Structuring an acquisition

Structuring a divestment

Financial due diligence

Tax due diligence

Legal document review

Project management

Post-transaction service

Post-deal integration

## Our M&A service references (excerpt)



Automatics



E-commerce



Robotization



Properties



Machinery



Production



Engineering



Semi-conductor



Plate glass



Apparels



Bio-chemicals



Healthcare

## M&A publications



\* [China optimizes entry/exit measures](#)

\* [Shanghai eases RHQ regulations](#)

\* [HK tax amendments](#) | [Impacts to Chinese investment](#)

# Transfer Pricing (TP)

In the context of increasingly transparent business environment and the Base Erosion and Profit Shifting (BEPS) project's call for a greater international tax regulation and review, China's tax authority has announced more detailed compliance regulations on inter-company transactions. Multinational companies have to assess their existing inter-company arrangements to avoid challenges and disputes from a transfer pricing perspective.

## Our strengths



We know our clients' inter-company transactions well by synergies built from other routine compliance checks. We implement our TP insights into the client's business.



Our professional team has a strong international exposure and a comprehensive hands-on experience for various transfer pricing projects.















For years, we have been handling transfer pricing documentations for clients in a wide range of industries:

- Machinery production industry
- Automobile parts industry
- Pharmaceutical industry
- Semi-conductor industry

## What we do within TP services

TP planning	Tax documentation	TP risk assessment	TP valuation
TP dispute resolution	Value chain analysis	Benchmarking study	Special adjustment issues

## Our TP service references (excerpt)

 Equipment	 Wire harness	 Engines	 E-commerce
 Cosmetics	 Communications	 Logistics	 Supply chain services
 Environmental	 Automobiles	 Medicals	 Purifiers

## TP publications






- [TP newsletters](#)
- [China TP guide](#)
- [Global TP guide](#)

# Customs

With the development of the Chinese economy status and the growth of international trade in China, the General Administration of Customs has strengthened the control and administration on all kinds of customs related issues. Consequently, challenge occurred more frequently to enterprises during customs related procedures.




## Our strengths

-  We have provided extensive consulting services in regard to various customs related issues.
-  We have cultivated a number of professionals and rich know-how through the practical handling of customs related affairs such as classification and country of origin, etc.
-  Our supports on the strategy planning and implementation play a significant role in the effective customs defense and appeal.

## What we do within customs services

Duty-paid pricing	Customs classification	Advisory on customs related issues	Specific support on special projects
Compliance check and risk assessment	Customs administrative appeal	Customs inspection	Import / Export operation procedures

## Our customs service references (excerpt)

 Table saw	 Engines	 Wire Harness Test Systems	 Bio-pharmaceutical
---	---	---	---

## Special highlights on customs risk

- Royalty charges between related parties are regularly subject to official scrutiny and a holistically professional review for it is recommended.
- A successful customs defense and appeal would avoid paying additional taxes effectively.

## Customs publications

<p>November 2022 # 3-2022</p> <p><b>WTS Customs Newsletter</b></p> <p>Editorial:</p> <p>Dear Reader,</p> <p>It is our pleasure to present you with the latest edition of the WTS Global Customs newsletter.</p> <p>We are all experiencing the weakening of the global economy, with increasing prices and further pessimistic forecasts for almost every part of the world. For this reason, customs tasks become increasingly important (e.g. tariff) opportunities in global trade should be higher on companies' agendas. At the same time, compliance with the rules must not lose its traction.</p> <p>That said, our colleagues from across the global network have given examples of exactly these opportunities.</p> <p>In <b>Brazil</b>, the government has approved a law intended to strengthen the economy, in particular the manufacturing industry, by extending the application of the drawback customs regime. This regime allows for the suspension of various taxes for imported goods that are used for the manufacturing of products that will be re-exported again. With the new law, certain services can be included in the regime that will lower the costs for companies and hopefully strengthen the economy.</p> <p>In <b>China</b>, customs have issued a notice relating the rules concerning voluntary disclosure for companies that have breached the law. While our colleagues point out the "all course" - positive aspects of this development, they also point out that this is a temporary situation. Affected companies should take note of this particular aspect.</p> <p>Public opinion of WTS <b>Italy</b> also writes about a situation where a company infringed the law by underpaying duties following the misclassification of the imported good. The positive aspect of the Italian Supreme Court's decision is that the fine to be paid was limited. Hopefully, this decision will have a positive effect on similar cases in Italy in the future.</p> <p>In the <b>UK</b>, the new Customs Declaration Service (CDS) was planned to be mandatorily used from 1 October 2022. After China gave an overview of some of CDS's key features, readers may be interested to know that the new system, while it is still in the testing phase, appears to be much better than the old CHIEF system.</p>	<p>TAX NEWS CHINA 2022 (No. 4 issue) April 2022</p> <p><b>China Customs relaxes voluntary disclosure rules</b></p> <p>In brief</p> <ul style="list-style-type: none"> <li>General Administration of Customs (GAC) recently adjusted the conditions for non-equivalent voluntary disclosure cases.</li> <li>The relaxations are valid only until the end of 2023.</li> </ul> <p>Contacts</p> <p>China</p> <p>Martin Ho Managing Partner martin.ho@wts.cn t: 86 21 9347 8655 ext.202</p> <p>Friedrich Associate Partner friedrich.f@wts.cn t: 86 21 9347 8655 ext.215</p> <p>Leo Zhou Associate leo.zhou@wts.cn t: 86 21 9347 8655 ext.203</p> <p>QR Code</p> <p>WTS - strong presence in about 100 countries / regions</p>
---	---




- [Global Customs Newsletter](#)
- [China Customs relaxes voluntary disclosure rules](#)



# Supply Chain Management (SCM)

Multinational companies have placed paramount importance on addressing global value chain challenges. We provide an overview of the trends and insights into the volatile loan of value chains and how executives can mitigate risks and harness opportunities.













## Our strengths

-  We provide an extensive consulting services to help companies achieve their development goals.
-  We have cultivated a number of professionals and rich know-how through the practical handling of supply chain related affairs such as supply chain planning, and health checks, etc.
-  Our supports on strategy planning and implementation play a significant role in the effective supply chain planning or even a customs defense.

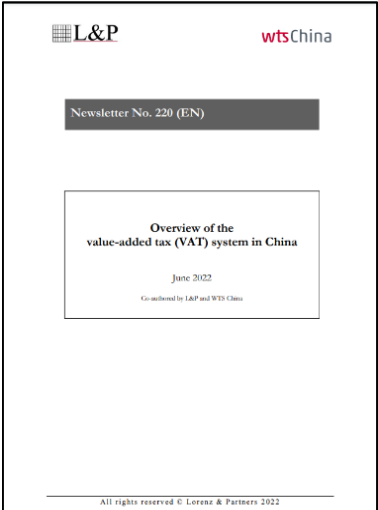

## What we do within SCM services

- Supply chain and inter-company charges consulting
- Business model and contract review
- Market entry and set-up planning
- Onshore and offshore structuring
- Financial due diligence
- Financing consulting
- Compliance check and risk assessment
- Tax/customs defense

## Our SCM service references (excerpt)

-  Mould
-  Inspection
-  Artificial intelligence
-  Vessels
-  Education
-  Semi-conductors
-  Equipment
-  Transports
-  OEMs
-  Pipeline
-  Parts
-  Tires

## SCM publications

- 
- 

- \* [Value Added Tax Newsletter](#)
- \* [Overview of the VAT system in China](#)
- \* [More China tax reliefs amid pandemic fallout](#)
- \* [China gearing for a full e-VAT process](#)

## Team members

Address: Unit 06-07, 20<sup>th</sup> Floor, Building 1, Shengbang International Tower, No.1318 North Sichuan Road, Hongkou District, Shanghai, China 200080  
Tel: +86 21 5047 8665



Martin Ng, Managing Partner ([martin.ng@wts.cn](mailto:martin.ng@wts.cn))

- » Martin has 33 years of professional experience (4 years in management consultancy and 29 years in China tax consulting). His specialty covers China tax risk controlling, transfer pricing compliance, business modelling and supply chain planning services.
- » Prior to joining WTS China in 2014, he was a KPMG China's tax partner in Shanghai and Hangzhou of China, and its national knowledge management leader. He has experienced the growth of two Big 4 firms' China tax practice in China. He is a frequent speaker to seminars and a trainer to tax officers, and a lecturer and a thesis reviewer for a Taxation MSc program of Shanghai University of Finance and Economics and a lecture for other universities. He holds Accounting MSc (Chinese University of HK) and Business Administration MBA (University of Wales, UK).



Maggie Han, Partner ([maggie.han@wts.cn](mailto:maggie.han@wts.cn))

- » Maggie has 17 years practical experience in China tax and customs advisory to medium and large multinational customers. As a tax advisor, she has advised client from wide range industries in all China tax area, specializing in advising of indirect tax, corporate income tax, transfer pricing, Merger & Acquisition, supply chain, Customs, and foreign exchange issues.
- » Maggie is in charge of transfer pricing service line and M&A service line in China, and responsible for relevant technology development and publication. She has extensive experience in defending client's position in tax audit and tax appeal, and also involved in series of customs audit projects. Maggie holds master degree and China Certified Tax Agent qualification.



Ened Du, Partner (Tax / Finance) and Department Head ([ened.du@wts.cn](mailto:ened.du@wts.cn))

- » Ened has over 16 years practical experiences in tax advisory for companies doing business in China. She has constantly providing tax consulting services to many multi-national companies for doing business in China. Having accumulated rich knowledge in practical dealing with Permanent Establishment (PE) projects and specially in the PE defense,
- » Ened is the author to the publication, "Taxation of PE in China". She is responsible for the global mobility service in China in providing a full-fledged expatriate service. She is also widely involved in supply chain structuring, tax health check and due diligence, customs issues, cross border transactions including cash repatriation and other related tax matters. Before joining WTS, she has worked in the tax department of a well-known multi-national accounting firm.

## Team members

Address: Unit 06-07, 20<sup>th</sup> Floor, Building 1, Shengbang International Tower, No.1318 North Sichuan Road, Hongkou District, Shanghai, China 200080  
Tel: +86 21 5047 8665



Max Su, Senior Manager (Tax / Finance) ([max.yao.su@wts.cn](mailto:max.yao.su@wts.cn))

- » Max has an over 19 years of dedicated professional career in the field of corporate accounting and tax advisory.
  - » He specializes in corporate accounting function administration, GAAP interpretation and implementation, financial reporting, management accounting, tax compliance and internal control advice. He also has extensive experience in transaction support, including financial due diligence for M&A and restructuring advice.
  - » He holds a BA degree from Shanghai University of Finance and Economics. He is a member of the Chinese Institute of Certified Public Accountant (CICPA).
- 



Sissi Shen, Manager (Tax / Finance) ([sissi.shen@wts.cn](mailto:sissi.shen@wts.cn))

- » Sissi has 10 years of professional and practical experiences in tax advisory. She is specialized in terms of tax compliance work in China, Permanent Establishment, corporate income tax, VAT, individual income tax, M&A and customs related compliance and advisory. She has extensive experience in the machinery production industry and engineering industry etc. Sissi holds the occupational qualification of Medium Level Accountant.

## WTS China's publications



- China Tax News
- Global Financial Services Newsletter
- Africa Quarterly Newsletter
- Transfer Pricing Newsletter
- ICT Service Line Newsletter
- Value Added Tax Newsletter
- Customs Newsletter
- Global Mobility Newsletter

Check out more publications at our [website](#).

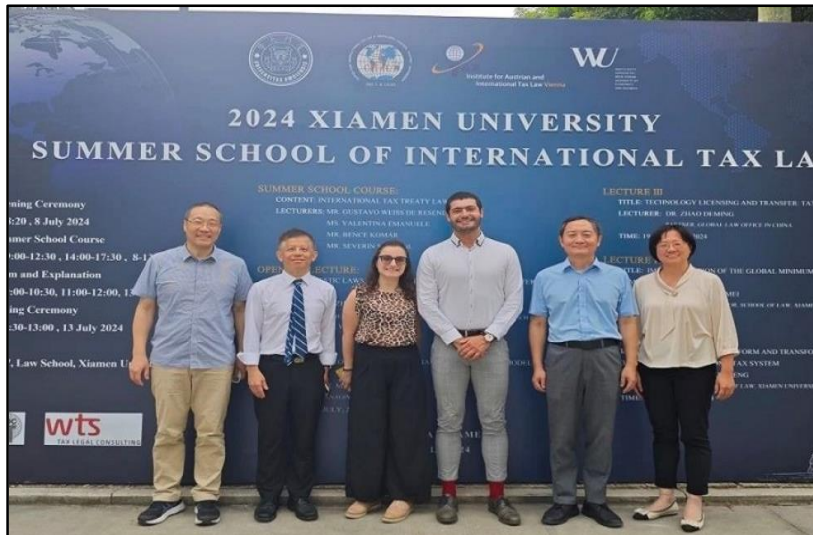




## University Partnership

WTS is dedicated to fostering academic excellence and global exposure for students:

- Xiamen University
- Shanghai FE University



## WTS China's events - webinars and seminars

Check out our event notices on our [website](#).





## WTS China's AI - PIAIground

WTS starts using AI technology globally, with a proprietary solution called “PIAIground”.

### COMMUNITY KNOWLEDGE

#### DAILY ASSISTANTS

- › Low entry barriers into AI
- › Basic tools
- › Smart guiding in everyday work
- › Includes essential functions of ChatGPT in a secure environment

#### › TAX ASSISTANTS

- › Chatbots for specific tax use cases
- › Secured data protection-compliant environment
- › Based on reliable, selected sources
- › Continuous expansion via the AI community

#### PROMPT ASSISTANTS

- › Personal assistants for education, prompting, and much more
- › Part of the prompt library

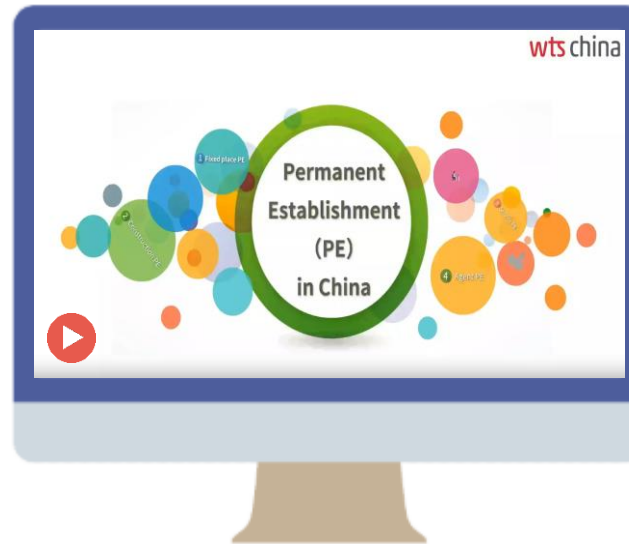
### COMPANY KNOWLEDGE

#### MY ASSISTANTS

- › Customized special chatbots based on your company data, available permanently
- › Bots can be added modularly
- › Preliminary analyses to assess feasibility
- › Secured in a personal area for your company
- › Company-internal policies or tax-specific guidelines on a specific topic are made available to employees through a specially created chatbot, for example: Travel Expense Policies
- › Guidelines, work instructions, and reporting channels of Tax CMS
- › Transfer Pricing Policy
- › etc.



**Tax tips in one minute (click to review)**





## WTS's awards



## Contact us



**WTS China Co., Ltd.**  
Unit 06-07, 20th Floor, Building 1, Shengbang International Tower, No.1318  
North Sichuan Road, Hongkou District, Shanghai, China 200080  
T: +86 21 5047 8665  
E: [info@wts.cn](mailto:info@wts.cn)  
W: [www.wts.cn](http://www.wts.cn)



### Contacts



Martin Ng  
Managing Partner  
[martin.ng@wts.cn](mailto:martin.ng@wts.cn)  
+ 86 21 5047 8665 ext.202



Maggie Han  
Partner  
[maggie.han@wts.cn](mailto:maggie.han@wts.cn)  
+ 86 21 5047 8665 ext.206



Ened Du  
Partner  
[ened.du@wts.cn](mailto:ened.du@wts.cn)  
+ 86 21 5047 8665 ext.215



Max Su  
Senior Manager  
[max.yao.su@wts.cn](mailto:max.yao.su@wts.cn)  
+ 86 21 5047 8665 ext.210



Sissi Shen  
Manager  
[sissi.shen@wts.cn](mailto:sissi.shen@wts.cn)  
+ 86 21 5047 8665 ext.220