



2025

Capability Statement

Why choosing WTS China?

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 Al tool globally (called "plAlground").

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



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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

What we do within ITP services

Project contract review

PE evaluation and mitigation advice

PE defense

PE handbook

PE registration

PE compliance service

PE deregistration PE related crossborder payment advisory

Our ITP service references (excerpt)



























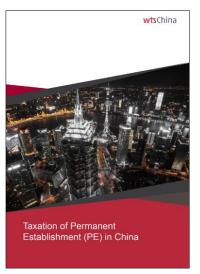
We have a customized PE tool to monitor and track the progress of PE registration and tax compliance.



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

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

Review on employee assignment policies Design on tax equalization plans

Tax cost allocations

Arrival / exit interviews

Payroll services

Visa and residence permits application

Compliance review / health check

Our GMS service references (excerpt)



Servicing



















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 a 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

> **Project** review

Financial due diligence

Post-transaction service

Tax due diligence

Post-deal integration

Legal document



Our M&A service references (excerpt)



Automatics



Plate glass



Structuring a

divestment

















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

TP publications





Our TP service references (excerpt)



Equipment























- TP newsletters
- China TP guide
- Global TP guides





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 original, 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

Compliance check and risk assessment

Customs classification

Customs administrative appeal

Advisory on customs related issues

Customs inspection

Specific support on special projects

Import / Export operation procedures

Our customs service references (excerpt)









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





- * 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

> Financial due diligence

and contract review

Market entry and set-up planning

Compliance check and risk assessment

Onshore and offshore structuring

Tax/customs defense

Business model

Financing consulting

Our SCM service references (excerpt)



Mould



OEMs

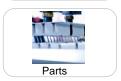






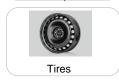




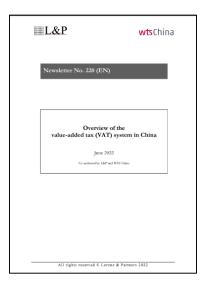








SCM publications





- * 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, 20th 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 (<u>martin.ng@wts.cn</u>)

- » 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)

- » 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)

- 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, 20th Floor, Building 1, Shengbang International Tower, No.1318 North Sichuan Road, Hongkou District, Shanghai, China 200080 Tel: +86 21 5047 8665



Sissi Shen, Manager (Tax / Finance) (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.



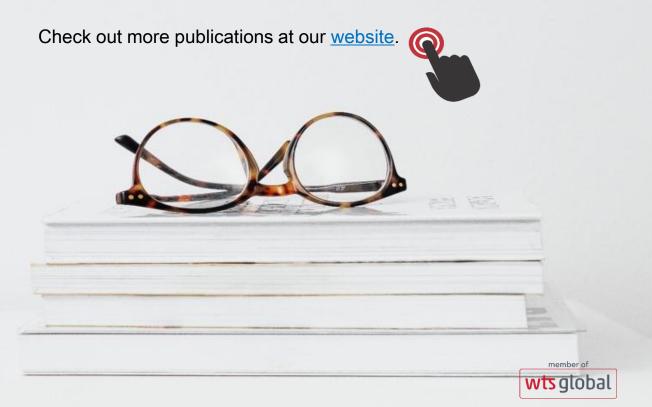
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wts china

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



University Partnership

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

- > Xiamen University
- Shanghai FE University





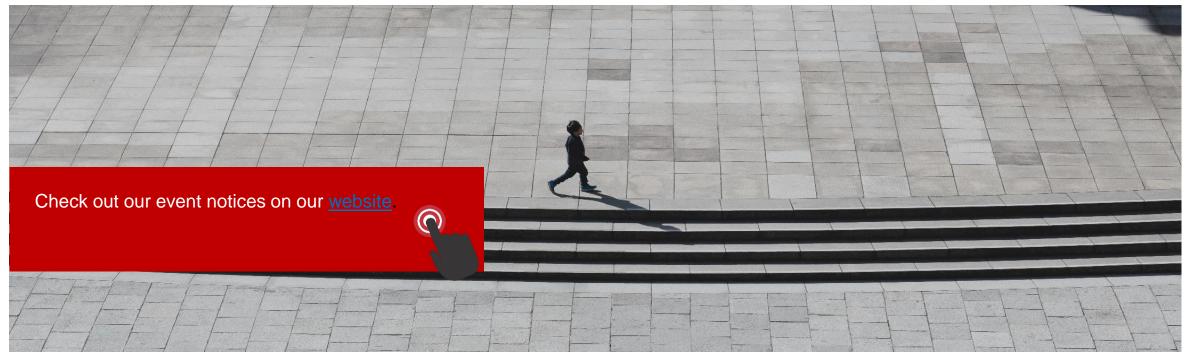




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WTS China's events - webinars and seminars











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.





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Tax tips in one minute (click to review)















WTS's awards





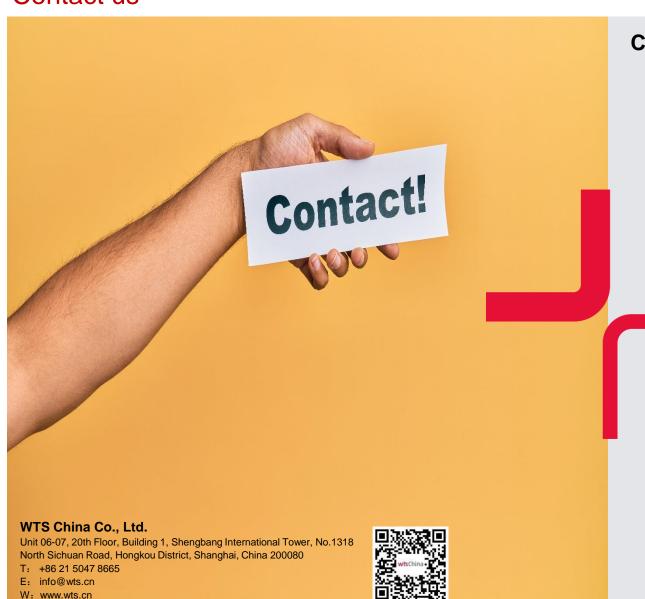








Contact us



Contact us



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