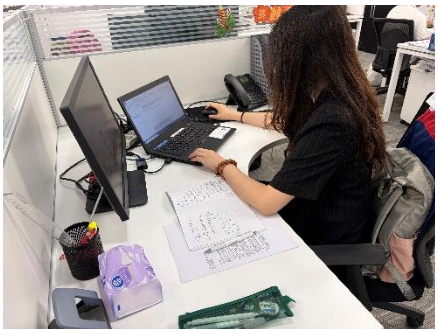
Internship Summary at WTS China

Esther Qi (11 May – 9 July 2026)

Background



As a master's student specializing in taxation, my academic studies have primarily focused on tax theories, tax regulations, and international tax rules. However, I had limited practical experience in understanding enterprises' actual tax-related needs, the workflow of tax advisory services, and the identification of tax risks arising from cross-border transactions. To further integrate theoretical knowledge with practical business applications and enhance my understanding of corporate tax management and cross-border tax services, I chose to undertake an internship at WTS China. During the internship, I participated in transfer pricing documentation, cross-border tax research, and various tax-related support tasks. Through project involvement and internal training, I gained a deeper understanding of the nature and practices of tax consulting services.

Work experience and project involvement

- Transfer pricing documentation and compliance

Through my involvement in transfer pricing-related work, I gradually developed a more comprehensive understanding of the compliance management of related-party transactions. During the internship, I participated in the update of transfer pricing documentation, data organization, and proofreading of Chinese and English versions of relevant documents. Through these tasks, I became familiar with key components of transfer pricing reports, including corporate business profiles, functional and risk analyses, related-party transaction information, and comparability analyses. By participating in these projects, I realized that transfer pricing analysis is not merely a process of organizing documentation; rather, it requires a comprehensive assessment of related-party arrangements based on the company's business model, value chain structure, and allocation of functions, assets, and risks. Meanwhile, working with bilingual tax documents also improved my ability to use professional terminology and enhance my written communication skills in the tax field.

- Cross-border tax training and research

During cross-border tax training sessions and project research, I further broadened my understanding of international tax practices. Through studying cases involving foreign enterprises providing technical services in China, I gained insights into the tax treatment of cross-border contracts, the determination of the taxable basis for multi-party agreements, and the tax filing and payment procedures applicable to foreign enterprises operating in China. These experiences helped me recognize that cross-border tax issues require comprehensive analysis based on tax regulations, contractual arrangements, and the substance of business activities, rather than relying solely on individual legal provisions or contractual wording.

- Support in practical tax projects

In supporting practical projects, I was exposed to various types of corporate tax matters. For example, while organizing export tax refund documentation, I reviewed the consistency and relationships among customs declarations, input VAT invoices, and other business documents, which helped me understand potential compliance risks in actual operations. In reviewing foreign debt registration procedures, I further learned about the differences between the “investment-to-registered capital ratio” approach and the “macro-prudential management” approach in terms of foreign debt quota administration. In addition, I participated in a special research project on whether the activities of non-resident enterprises in China would constitute a permanent establishment (PE). By reviewing the China-Germany Double Taxation Agreement and relevant policy documents, I analyzed the differences between service permanent establishments and construction or installation permanent establishments in terms of applicable conditions and time thresholds. This experience strengthened my ability to apply tax treaty provisions to real business scenarios.

- Policy Research and Structured Problem-Solving

In addition to specific project assignments, I conducted policy research and data analysis on various topics, including individual income tax determination, tax requirements in the pharmaceutical manufacturing industry, enterprise deregistration procedures, and VAT audit risk cases. Through these tasks, I gradually developed a structured approach to addressing tax issues: understanding the business background, identifying relevant tax concerns, researching applicable policies, and organizing practical solutions. This process improved my ability to independently analyze and resolve real-world tax issues.

Key takeaways and future direction

Through continuous exposure to practical tax work, I gradually realized that professional tax services differ significantly from purely theoretical learning. Practical tax work places great emphasis on attention to detail. From policy interpretation and document preparation to report drafting, every step requires accurate judgment based on the actual business circumstances. Even minor oversights may create compliance risks or additional costs for enterprises. When dealing with unfamiliar areas, I gradually developed the habit of first identifying relevant policy foundations and then analyzing feasible approaches based on the substance of business activities. By proactively conducting policy research, integrating information, and summarizing experiences, I further enhanced my independent analytical and problem-solving abilities. At the same time, I came to understand that the value of tax consulting does not lie merely in completing tax filings or preparing documentation. More importantly, it involves viewing issues from the perspective of business operations, identifying potential tax risks in advance, and providing targeted and practical compliance recommendations based on clients’ specific circumstances.

This internship effectively addressed the gap between my academic training, which was more focused on theoretical knowledge, and the practical requirements of professional tax work. It enabled me to develop a more comprehensive and market-oriented understanding of transfer pricing, cross-border taxation, and daily corporate tax management. After returning to university, I will continue to connect the practical cases and experiences gained during my internship with academic theories, strengthen areas where my knowledge remains insufficient, and further deepen my study of cross-border taxation. By transforming practical experience into professional expertise, I hope to continuously improve my capabilities and build a solid foundation for my future career development in the tax field.