

Practice Areas of Leezhao--- Taxation, Finance

Practice Areas:

From the perspective of law, tax and financial services involve multiple phases and fields of business entities (including foreign capital / domestic capital / joint ventures, company / partnership, fund, individual, etc.) during their establishment, operation, change, investment, M & A, liquidation, bankruptcy, etc., which specifically includes the following:

- Provide tax planning services regarding the tax payment and application for tax preferences on goods and services transaction turnover tax (VAT / consumption tax / turnover tax surcharge), real estate related tax (real estate tax / urban land use tax / land VAT / VAT / deed tax /), income tax (enterprise / individual income tax), other taxes (stamp tax / vehicle purchase tax), etc.
- Provide financial assistance services in asset confirmation and investigation (including land / real estate / intangible assets / vehicles / fixed assets / bank deposits, etc.), financial data and interpretation (balance sheet / profit statement / cash flow statement / owner 's equity change statement), financial analysis and comparison (solvency / operability / profitability), enterprise value and evaluation (income approach / cost approach / market approach, etc.)

The professional services hereof provided by Leezhao include:

1. Provide tax planning and financial assistance for the clients' establishment (select the tax-saving approach according to the law);
2. Provide tax planning and financial assistance for the clients' operation (including various products / services transaction contracts, related transactions / transfer pricing, profit distribution, etc.);
3. Provide tax planning and financial assistance for the clients' change (including equity transfer / asset sale, address change, change of business entity form, etc.);
4. Provide tax planning and financial assistance for the clients' investment (including establishment of branches / subsidiaries, debt / equity investment, direct / financial investment, etc.);
5. Provide tax planning and financial assistance for the clients' M & A (including equity / asset M & A, absorption / new merger, survival / new separation, etc.);
6. Provide tax planning and financial assistance for the clients' liquidation (including asset liquidation, settlement of claims and debts, employee placement, investment income, etc.);
7. Provide tax planning and financial assistance for the clients' bankruptcy (including bankruptcy plan, property management, bankruptcy reorganization, etc.);
8. Provide tax planning and financial assistance for the clients' employee income (including salary, bonus, economic compensation and other arrangements involved in

the signing, modification, termination / expiration of the labor contract, as well as foreign individual income);

9. Communicate with the transaction counterparty on behalf of the client, provide tax analysis opinions, and select the legitimate and tax-saving transaction mode;
10. Communicate with tax authorities on behalf of the client, confirm the conditions of tax preference, and strive to enjoy tax-saving preference according to the law, etc.

Achievements (Typical Cases)

Achievements of Leezhao in Taxation, Finance

Recent years, as retained by clients, we handled some typical cases in taxation, finance, which includes:

1. A Global 500 group company planned to integrate and reorganize the equities of dozens of subsidiaries in mainland China, and Leezhao provided comprehensive legal services, including tax consultation, analysis, confirmation, arrangement and other planning services. Based on the unique equity structure of dozens of subsidiaries, Leezhao fitted them into special tax treatment and general tax treatment, which saved a large amount of taxes for this group company on the premise that all taxes were legally paid.
2. A foreign-invested real estate enterprise planned to acquire a domestic real estate enterprise, and Leezhao provided comprehensive legal services: analyzed different tax obligations between equity merger and asset merger in detail, coordinated and communicated with commerce, tax, land and other authorities, and selected a legitimate and tax-saving approach for the client according to law, and after the foreign-invested real estate enterprise completed the development of the real estate project, Leezhao provided tax planning for the rental and sale of the real estate project.
3. In a financing project valued over 10 billion yuan, Leezhao provided comprehensive legal services for all financing parties: made related planning in advance, selected the legal entities for all financing parties, applied for tax preference for relevant legal entities in compliance with Chinese laws, and handled the government certification procedures, which saved taxes amounted to hundreds of millions of yuan for this financing project.
4. An overseas enterprise has long provided cross-border service to its subsidiary, a foreign-invested enterprise in China, in which a large number of taxes were withheld and paid by this subsidiary. By analyzing the essence of this cross-border service transaction, Leezhao determined that relevant tax relief policies could be granted under Chinese laws and regulations, and thus collected application materials,

communicated with the competent tax authorities for confirmation, and finally received preferential tax deduction, which greatly saved the tax cost of this long-term cross-border service.

5. Leezhao has routinely provided to related clients the tax planning and financial assistance services such as tax consultation, analysis, confirmation, arrangement, etc. regarding their daily transactions, investment and M & A, employee salary, etc.