
Briefing on Tax & Registration for FIEs & FEs in Shanghai

外商投资企业与外国企业在沪税务及企业注册简介

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Foreword 前言

The taxation system of China is quite complex due to the numerous types of tax, here what we defined tax is mainly for FIE and FE.

由于中国税种繁多较为复杂，这里提到的是与外商投资企业(FIE)及外国企业(FE)相关的税。

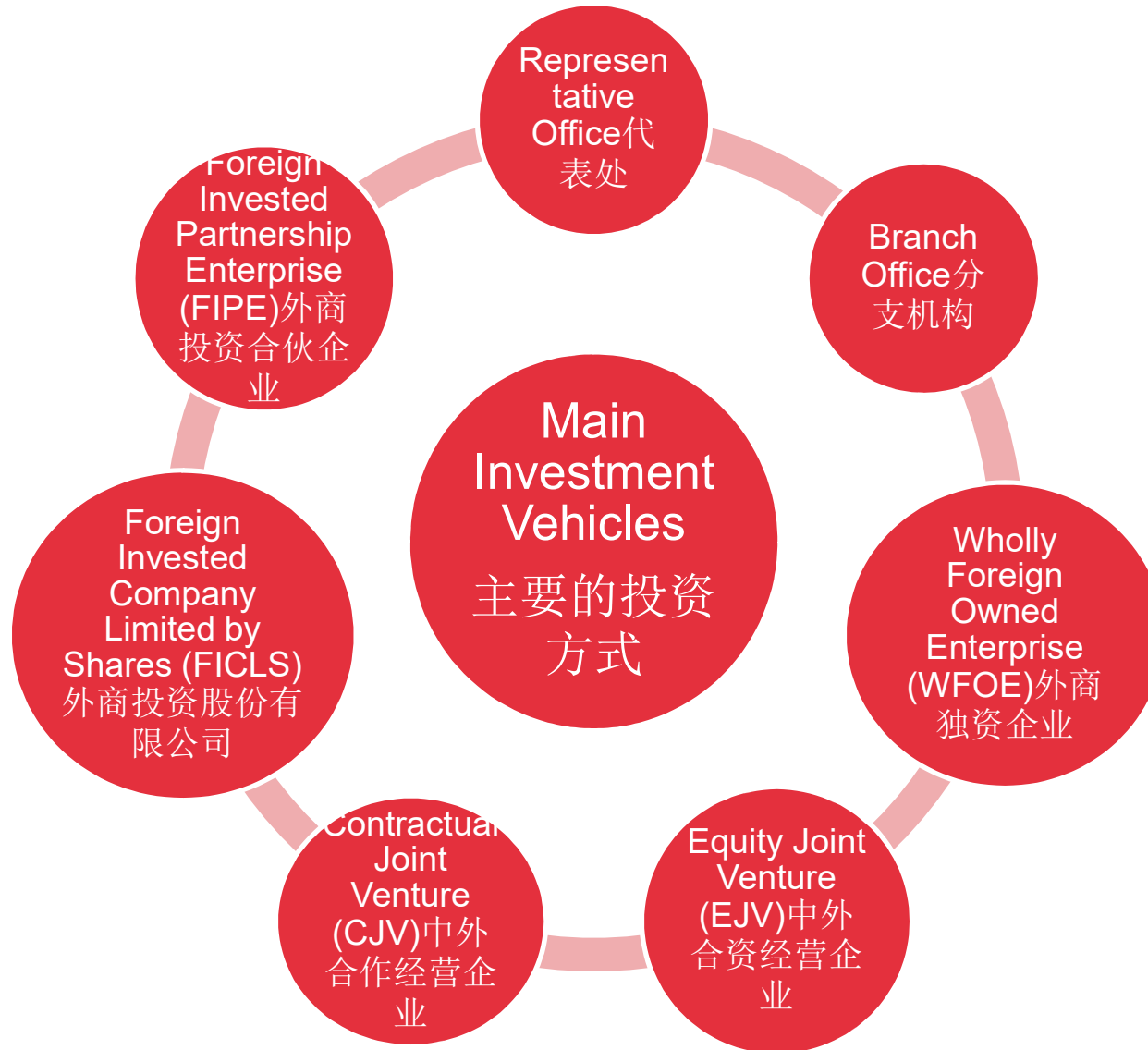
FIE is abbreviation for Foreign Invested Enterprises and FIE include WFOE/EJV/CJVs/FICLS/FIPE, while FE are representative offices and branch offices.

外商投资企业(FIE)包括外商独资企业(WFOE)、中外合资经营企业(EJV)、中外合作经营企业(CJV)、外商投资股份有限公司(FICLS)及外商投资合伙企业(FIPE)，而外国企业(FE)包括代表处及分支机构。

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Main Vehicles of Investment 主要投资方式



Comparison of FIEs, Representative Offices & Branch Offices

外商投资企业与代表处及分支机构的比较

Investment Vehicle 投资方式	FIEs 外商投资企业	Representative Office 代表处	Branch Office 分支机构
Main Feature 主要特征	Legal person (except for some CJVs). 具备法人资格（除了某些中外合作经营企业外）	Non legal person. Liability is borne by the foreign parent company. Usually set up by a foreign company which wishes to acquire local knowledge of the market prior to establishing full operations in China. 无法人资格。责任由国外的母公司承担。通常由国外企业在全面进入中国前为了解当地市场信息而设。	Non legal person. Liability is borne by the foreign parent company. Mostly set up by insurance companies for banks. 无法人资格。责任由国外的母公司承担。多数由保险公司为银行而设。
Pros 优势	Can engage in direct business activities 可直接从事商业相关活动	Simple and quick procedure for establishment. Need not meet stringent requirements for e.g. capital contribution and debt-equity ratios. 设立流程简单快捷。对资本金、负债率等不作硬性要求。	Same as Representative office . 与代表处相同。
Cons 劣势	More complex and time consuming establishment procedures. Strict requirements on items such as capital contributions and debt-equity ratios. 企业设立流程更为复杂且耗时长。对于注册资本金和企业负债率等作严格要求。	Strictly limited business scope. Only allowed to engage in indirect business activities. 严格限制商业经营范围。只允许参与间接的商业活动。	Same as Representative office except that a Branch Office is allowed to engage in profit making business. 与代表处相同，但分支机构受允参与盈利业务。

Comparison of different types of Foreign Invested Enterprises

几种不同外商投资企业类型的比较

Investment Vehicles 投资方式	Wholly Foreign Owned Enterprise (WFOE) 外商独资企业	Equity Joint Venture (EJV) 中外合资经营企业	Contractual Joint Ventures (CJV) 中外合作经营企业	Foreign Invested Company Limited by Shares (FICLS) 外商投资股份有限公司	Foreign Invested Partnership Enterprise (FIPE) 外商投资合伙企业
Form/Legal Status and business scope 组织形式/法人地位及经营范围	Limited liability company as legal person. 有限责任公司法人	Limited liability company as legal person 有限责任公司法人	Limited liability company as legal person or an unincorporated CJV as a non legal person. 具有法人资格的，组织形式为有限责任公司 不具有法人资格的，合作各方为合作关系。	Limited liability company as legal person. 有限责任公司法人	legal person, types: 具备法人资格, 包括 1. General partnership Enterprise (GPE), which includes Special general partnership enterprise (SGP), bearing unlimited liability 普通合伙企业(含特殊的普通合伙企业), 合伙人对合伙企业债务承担无限连带责任 2. Limited partnership enterprise (LPE), bearing limited liability 有限合伙企业, 有限合伙人以其认缴的出资额为限对合伙企业债务承担责任。
Investment method 投资方式	Each party contributes in cash, in kind, with IPRs or land use rights, etc. 各出资方以现金或类似专利、土地使用权等形式参与投资	Same as WFOE. 与外商独资企业相同。	The parties may provide for conditions of cooperation such as sales channels or special licenses, etc. 各方可以有条件地提供销售渠道或特殊证照等形式合作	The promoters may contribute in cash, in kind, with IPRs or land use rights, etc. 发起人可采用提供现金或类似专利、土地使用权等形式参与投资	No requirements on minimum registered capital; simpler establishment procedures comparing with WFOE or JV 对于注册资本金不作要求。企业注册流程相比外商独资企业与合资/合作企业更为简单。
Share of profits and risk 利润与风险承担	Shared between the investors as per the articles of association. Distributions will be subject to the foreign exchange control by State administration of Foreign Exchange(SAFE) 根据企业章程由投资者共同承担。分担比率将受外管局(SAFE)管控	Shared in accordance with the ratio of the respective equity interests of each party. Profits may only be distributed in the form of cash. 各方依据所占的权益比率承担相应的利润与风险。利润只能以现金形式分配。	Shared between the parties in accordance with the terms of the joint venture contract, and need not be shared in proportion to the parties' contributions to the CJV. 各方应依据合作契约的条款承担相应利润与风险，无需对应各方对企业的贡献。	Same as EJV. 与中外合资经营企业相同。	The profit distribution of a Partnership Enterprise could follow an informal negotiated agreement or abide by scheme adopted in the partnership agreement. 投资合伙企业的利润分配按照合伙人间的协议或者非正式的协商结果分配。
Management 管理	The sole shareholder or the shareholders' meeting is the highest organ of authority. 独资股东或股东会是最髙权力机构。	The board of directors is the highest organ of authority. 董事会是最髙权力机构。	The board of directors or joint management committee is the highest organ of authority. 董事会或联合管理委员会是最髙权力机构。	The shareholders' meeting is the highest organ of authority. 股东大会是最髙权力机构。	The partners' meeting is the highest organ of authority. 合伙人会议是最髙权力机构。

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An Overview of PRC Taxes

缴税适用范围

Rage of Tax 税种	Types of Tax 税目	Tax Administration 税收征管
Turnover Taxes 流转税	Value Added Tax, Consumption Tax, Customs duties 增值税、消费税和关税	Local branches of the State Administration of Taxation (SAT) and the local branches of the Local Tax Bureau 各地的国家税务局分局、地方税务局
Income Taxes 所得税	Corporate Income Tax, individual income tax 企业所得税、个人所得税	local branches of the Local Tax Bureau 地方税务局
Taxes on Real Estates 与房产有关的税	Land appreciation tax, real estate tax, arable land occupation tax, and urban and township land-use tax 土地增值税、房产税、耕地占用税和城镇土地使用税	local branches of the Local Tax Bureau 地方税务局
Other Taxes 其他税种	Deed tax, stamp duty, custom duties, motor vehicle acquisition tax, vehicle and vessel tax, resource tax, urban construction and maintenance tax, vessel tonnage tax and tobacco tax 契税、印花税、关税、车辆购置税、车船税、资源税、城市维护建设税、船舶吨税和烟叶税等。	local branches of the Local Tax Bureau 地方税务局

- There is no capital gains tax as such in the PRC. Gains on the sale of fixed assets are taxable as ordinary income.
- 中国不设资本利得税，出售固定资产所得也视为普通收入征收所得税。

Definition of relative categories of Tax – Referred to PWC documents and *Invest in China*

相关税的定义 – 参考普华永道相关文件及《投资中国》

Value Added Tax 增值税

- Value Added Tax applies when entities sell, manufacture, process, or repair tangible goods in, or import such good to, China.
- 增值税是对在中国境内销售货物或者提供生产、加工、修理修配劳务以及进口货物的单位和个人就其实现的增值额征收的税。

Consumption TAX 消费税

- consumption Tax applies to certain manufactured, processed or imported luxury goods, such as cosmetics, alcohol and cigarettes. The manufacturer, processor and importer are liable for such tax.
- 消费税是对个别生产、加工或进口奢侈商品，例如:化妆品、烟酒的生产商、加工商及进口商所征收的税。

Corporate Income TAX 企业所得税

- Tax resident enterprise (TRE) is a new concept in the Corporate Income Tax (CIT) Law. TRE refers to an enterprise established according to the Chinese law or an enterprise established according to foreign laws but with its effective management located in China. TREs are subject to CIT on world wide income while non-TREs only on China sourced income. Enterprises registered in China are always TRE. A FE with effective management in China may also be regarded as a TRE.
- 企业所得税法引入居民企业概念。居民企业是指依照中国法律成立的或依照外国法律成立但实际管理机构设在中国的企业。居民企业需就全球收入在中国缴纳企业所得税，而非居民企业仅就来源于中国的收入缴纳企业所得税。中国注册的企业必然是居民企业，而实际管理机构设在中国的外国公司也可能被认定为中国居民企业。
- Under the new PRC Corporate Income Tax Law (2007), Corporate Income Tax is levied on a net basis at the rate of 25% in the absence of any preferential tax treatment.
- 最新的企业所得税法规定，在没有税收优惠政策等的前提下，法定税率是25%。

Definition of relative categories of Tax – Referred to PWC documents and *Invest in China*

相关税的定义 – 参考普华永道相关文件及《投资中国》

Individual Income Tax 个人所得税

- Individuals domiciled in the PRC are subject to China individual income tax (IIT) on their worldwide income.
- Individuals who do not domicile in the PRC but reside in the PRC between one to five years may, with approval, pay tax only on their PRC sourced income and non-PRC sourced income, the payment of which is borne by PRC establishments. They will be taxed on their worldwide income for each fully year residing in the PRC from the sixth year onward.
- Foreign individuals residing in the PRC for less than one year are subject to IIT on their PRC sourced income only.
- 在中国境内有住所的个人需就其全球收入在中国缴纳个人所得税。
- 在中国境内无住所，但居住1年以上而未超过5年的外籍人士，经批准，可以只就其在中国境内取得的所得或虽不来源于中国但是由中国境内的机构负担的所得缴纳个人所得税。从第六年开始，外籍个人在中国居住每满一年就要就其当年的全球收入缴纳中国所得税。
- 在中国境内居住而没有满一年的外籍个人仅需就其在中国境内取得的所得缴纳个人所得税。

Monthly Taxable Income* (RMB) 每月应缴纳所得税* (人民币)	Tax rates (%) 税率%
Under 1,500 不超过1,500	3
The part exceeding 1,500 but not exceeding 4,500 超过1,500至4,500的部分	10
The part exceeding 4,500 but not exceeding 9,000 超过4,500至9,000的部分	20
The part exceeding 9,000 but not exceeding 35,000 超过9,000至35,000的部分	25
The part exceeding 35,000 but not exceeding 55,000 超过35,000至55,000的部分	30
The part exceeding 55,000 but not exceeding 80,000 超55,000至80,000的部分	35
The part exceeding 80,000 超过80,000的部分	45

**Monthly taxable income is calculated after a monthly standard deduction of RMB3,500. For foreign individuals working in China (including residents of Hong Kong, Taiwan and Macau), the standard monthly deduction is RMB4,800.*

Where an individual's income tax liability is borne by the employer, the tax liability is calculated on a grossed-up basis and a different tax rate table will be used to reflect the tax-on-tax effect.

**应纳税所得额按照每月收入减每月人民币3,500的标准扣除额计算。在中国工作的外籍个人（包括港、澳、台居民）的每月扣除额为人民币4,800。*

此表不适用于个人所得税是有雇主复旦的情形。当个人所得税是由雇主负担，应适用另一税率表计算。

Definition of relative categories of Tax – Referred to PWC documents and *Invest in China*

相关税的定义 – 参考普华永道相关文件及《投资中国》

City Maintenance & Construction Tax 城市维护建设税

- City maintenance and Construction Tax is imposed at a certain rate on the amount of China's indirect taxes (i.e. business tax, VAT, and consumption tax) payable by the taxpayer. Effectively, the taxpayers of indirect taxes are also the taxpayers of urban construction and maintenance tax. It is charged at three different rates depending on the taxpayer's location, 7% for urban areas, 5% for country areas, and 1% for other areas.
- 城市维护建设税以纳税人实际缴纳的流转税（即营业税、增值税及消费税）税率为计税依据，按照一定的税率进行计缴。凡缴纳流转税的单位和个人，都是城市维护建设税的纳税义务人。城市维护建设税税率根据地区的不同分为三档：纳税人所在地在市区的，税率为7%；所在地在县、镇的5%；其他地区1%。

Deed tax 契税

- Deed tax, generally at rates from 3% to 5%, maybe levied on the purchase or sale, gift or exchange of ownership of land use rights or real properties. The transferee/assignee is the taxpayer.
- 土地使用权或房屋所有权的买卖、赠与或交换需按成交价格或市场价格的3%至5%征收契税。纳税人为受让人。

Stamp duty 印花税

- All enterprises and individuals who execute or receive “specified documents” are subject to stamp tax. Rates vary between 1.005% on loan contracts to 0.1% for property leasing and property insurance contracts. A flat amount of RMB5 applies to certification evidencing business licenses and patent, trademark or similar rights.
- 所有书立、领受“应税凭证”的单位和个人都应缴纳印花税。印花税税率从借款合同金额的0.005%到财产保险合同金额的0.1%不等。对于营业执照、专利、商标以及其他权利许可证照按每本人民币5元征收印花税。

Customs duty 关税

- Customs duty is a kind of tax levied on goods entering the territory of a country. The consignees of imported goods, the consignors of exported goods and the owners of incoming articles are taxpayers.
- 关税是对进入中国境内的商品征收的税，进口商品的收货人，出口商品的发货人及物品的最终归属者都是纳税人。
- Customs duties are generally collected by the customs on the basis of the taxable value of the goods or their quantity at certain rates. There are two types of import duty rate: general and preferential.
- 关税通常由海关根据应税商品的价值或数量对应税率来征收。共有两类进口关税税率：常用税率及优惠税率。

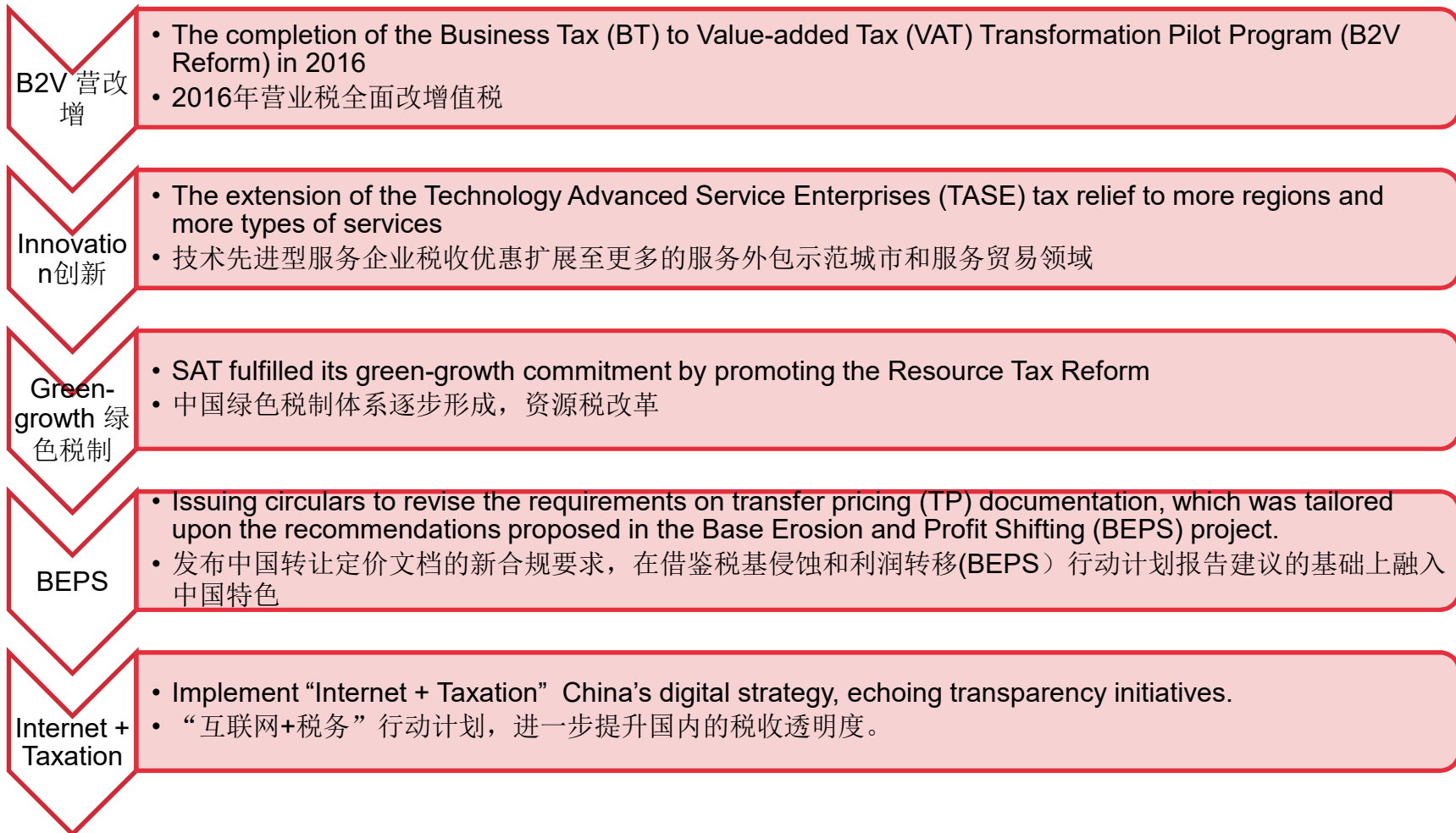
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New Tax Policies 税收新政

The State Administration of Taxation (SAT) has released a series of tax policies to support the transition of China's economy.

为支持中国经济转型，国家税务局总局推出了一系列税收政策。



B2V Reform in China 营业税改增值税相关政策

The Ministry of Finance (MOF) and the State Administration of Taxation (SAT) jointly released Caishui [2016] No. 36 (Circular 36), which signifies the completion of the B2V Reform in China and the removal of BT from China's indirect tax regime.

2016年财政部和税务总局发布《关于全面推开营业税改征增值税试点的通知》（36号文），标志着营业税全面改为增值税。

Business Tax Sectors 营业税税目	Rate% 税率
Transportation services 交通运输业	3%
Financial services 金融业	5%
Consumer services 服务业	5%
Culture and Sports 文化体育业	3%
Transferring of Intangible property 转让无形资产	5%



Taxpayers 缴税人群	Applicable VAT Sectors 增值税应税项目	Rate% 税点
	Tangible movable property leasing service 有形动产租赁服务	17%
	<ul style="list-style-type: none"> • Transportation service 交通运输业 • Postal service 邮政业服务 	11%
normal taxpayers 一般纳税人	<ul style="list-style-type: none"> • Basic telecommunications service 基础电信服务 • Value-added telecommunications service 增值电信服务 • Certain modern service industries 部分现代服务业 <ul style="list-style-type: none"> • research, development and technical service 研发和技术服务 • Information technology service 信息技术服务 • Cultural creative service 文化创意服务 • Logistic auxiliary service 物流辅助服务 • Certification and consulting service 鉴证咨询服务 • broadcasting, cinematic and television service 广播影视服务 • Business auxiliary services 商务辅助服务 • Other modern services 其他现代服务 	6%
	Small-scale taxpayers 小规模纳税人	All applicable VAT sectors 所有应税服务
Special 特殊	Some Special sectors 特定的某些应税服务	0%/免税

To normal taxpayers, tax cost may increase or decrease according to its specific operation status, e.g.: structure of cost and asset, ratio of product to out-sourcing service, or positioning at the market.

对于一般纳税人，按其特定的运作情况，如成本和资产结构的组合，产品/服务外包的比例，或市场上的定位，税收成本负担将会增加或下降。

Value Added Tax detailed tax rates 增值税具体税率

Different taxation methods apply to normal and small-scale taxpayers

一般纳税人与小规模纳税人需要缴纳的增值税额有所区别

Normal Taxpayers

一般纳税人

- Subject to VAT in China and annual turnover meet or above RMB5 mil.
- 提供增值税应税服务且年销售额在500万元人民币及以上

To compute the Value Added Tax payable, normal taxpayers need to separately calculate the output tax and the input tax for the current period. 为计算当期应缴纳增值税，一般纳税人需要分别计算销项税额与进项税额

the formula for computing the tax payable is as follows 适用公式:

Tax payable = Output tax payable for the current period – Input tax for the current period
当期应缴增值税=销项税额-进项税额

Tax payable=(turnover receivable – deductible items)(applicable tax rate/1+applicable tax rate) – (input tax – input tax deductions)

增值税=(收到的全部价款 – 可扣除项目)* (适用税率/1+适用税率) - (进项税额-进项税额转出)

Small Scale Tax Payers

小规模纳税人

3%

- Subject to VAT in China and annual turnover below RMB5 mil.
- 提供增值税应税服务且年销售额在500万元人民币以下

Provisions on Value Added Tax refunds and exemptions

增值税减免条例

1. Transferring of personal copy rights 个人转让著作权
2. Disabled person to provide services which are subject to VAT 残疾人个人提供应税服务。
3. Aviation companies to provide agricultural chemicals spray services 航空公司提供飞机播洒农药服务。
4. Technology Transferring, Technology Development and those relevant technical consultancy and technical service works 技术转让、技术开发和与之相关的技术咨询、技术服务
5. Qualified energy-saving companies to provide contractual services related with energy management projects applied to VAT 符合条件的节能服务公司实施合同能源管理项目中提供的应税服务
6. Off-shore Outsourcing companies registered in Shanghai to provide relative off-shore services applied to VAT 注册在上海的企业从事离岸服务外包业务中提供的应税服务

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Regular Tax on FIEs 向外国投资企业征收的税务

The main types of tax applicable to FIEs can be divided into two groups depending on the tax levying authorities: taxes levied by tax bureaus and customs duties levied by Customs

对外国投资企业征收的税分成两大类：税务局征收的税及海关征收的海关税

Tax Levying Authorities 征收主体	Tax Rages divided by tax levying objects 按照征收对象分类	Tax types 征收的类目
Taxes Levied by tax bureaus 税务局征收的税	Turnover taxes on business transactions, including 根据货物、劳务交易征收的流转税	Value Added Tax 增值税
	Taxes on income, including 根据所得征收的税	Consumption Tax 消费税
	Taxes on property and on certain transactions or expenditures, including 根据财产、资源的交易或开支等征收的税	Corporate Income Tax 企业所得税
		Individual income tax 个人所得税
		City maintenance and construction Tax 城市维护建设税
		Deed Tax 契税
Stamp Duty 印花税		
Customs duties levied by Customs 海关征收的海关税		

Regular Tax on FIEs 向外国投资企业征收的税务

税种 Type of Tax	说明 Description	企业纳税总计 Total tax by company	国税部分 Tax of national level	地税部分 Tax of local level	
				市级总计 Municipal Level	区级总计 District Level
增值税 Value Added Tax	有形动产租赁服务Tangible movable property leasing service 17% 交通运输服务transportation service, 邮政业服务postal service, 基础电信服务 basic telecommunications service 11% 增值电信服务Value-added telecommunication service, 部分现代服务业 Certain modern service industries6% 小规模纳税人 small-scale taxpayers 3% 某些特定的应税服务some special sections 0%	100%	50%	50.00%	
企业所得税 Corporate Income Tax (25%)	高新技术企业15% (高新/特殊技术认证, 后期研发投入) 15% for qualifying High-technology companies (need certification for technologies, and R&D function afterwards) 企业所得税20%小规模纳税人 20%for qualifying small-scale enterprises	100%	60%	20%	20%
个人所得税 Individual Income Tax	The assessment of the Individual Income Tax payable is based on a progressive tax rate system, plus with: 个人所得税适用超额累进税率同时考量:	100%	60%	18%	22%

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Regular Tax on FEs 向外国企业征收的税务

税种 Type of Tax	说明 Description	企业纳税总计 Total tax by company	国税部分 Tax of national level	地税部分 Tax of local level	
				市级总计 Municipal Level	区级总计 District Level
增值税 Value Added Tax	具体根据外国企业在中国所涉业务性质而定 Case by case if FEs distribute their goods, technology or services to China.	100%	50%	50.00%	
企业所得税 Corporate Income Tax (25%)	FEs are subject to Corporate Income Tax only with respect to income earned in China. The taxation of foreign enterprises differs depending on whether or not it has an establishment in China. 外国企业仅需就在中国所得缴税，具体税额依据在中国是否有具体设立分为三种情况： #Taxation of FEs without establishments in China 外国企业在中国无机构实体 #Taxation of Foreign Enterprises with establishments in China 外国企业在中国境内有机构实体 #Taxation of Foreign Enterprises with permanent activity in China 外国企业在中国有永久运营机构实体	100%	60%	20%	20%
个人所得税 Individual Income Tax	The assessment of the Individual Income Tax payable is based on a progressive tax rate system, plus with: 个人所得税适用超额累进税率同时考量： #whether domiciled in China 是否在中国有住所 #length of domicile period 在中国境内的停留时间	100%	60%	18%	22%

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Registered capital for FIE 外商投资企业注册资本

Minimum registered capital VS Amount of total investment for FIE 外商投资企业注册资本与投资总额之间的关系

Amount of total investment 投资总额注册	Minimum registered capital 资本最低限额
US\$3 million or less 300万美元或以下	70% of total investment 投资总额的70%
US\$3-10 million 300万美元以上至1000万美元 (含1000万美元)	Higher or US\$2.1 million or 50% of total investment 投资总额的50%但不得低于210万美元
US\$10-30 million 1000万美元以上至3000万美元 (含3000万美元)	Higher or US\$5 million or 40% of total investment 投资总额的40%但不得低于500万美元
More than US\$30 million 3000万美元以上投资	Higher of US\$12 million or 33.3% of total investment 总额的33.3%但不得低于1200万美元

Process of the establishment of FIE

外商投资企业设立（备案）流程

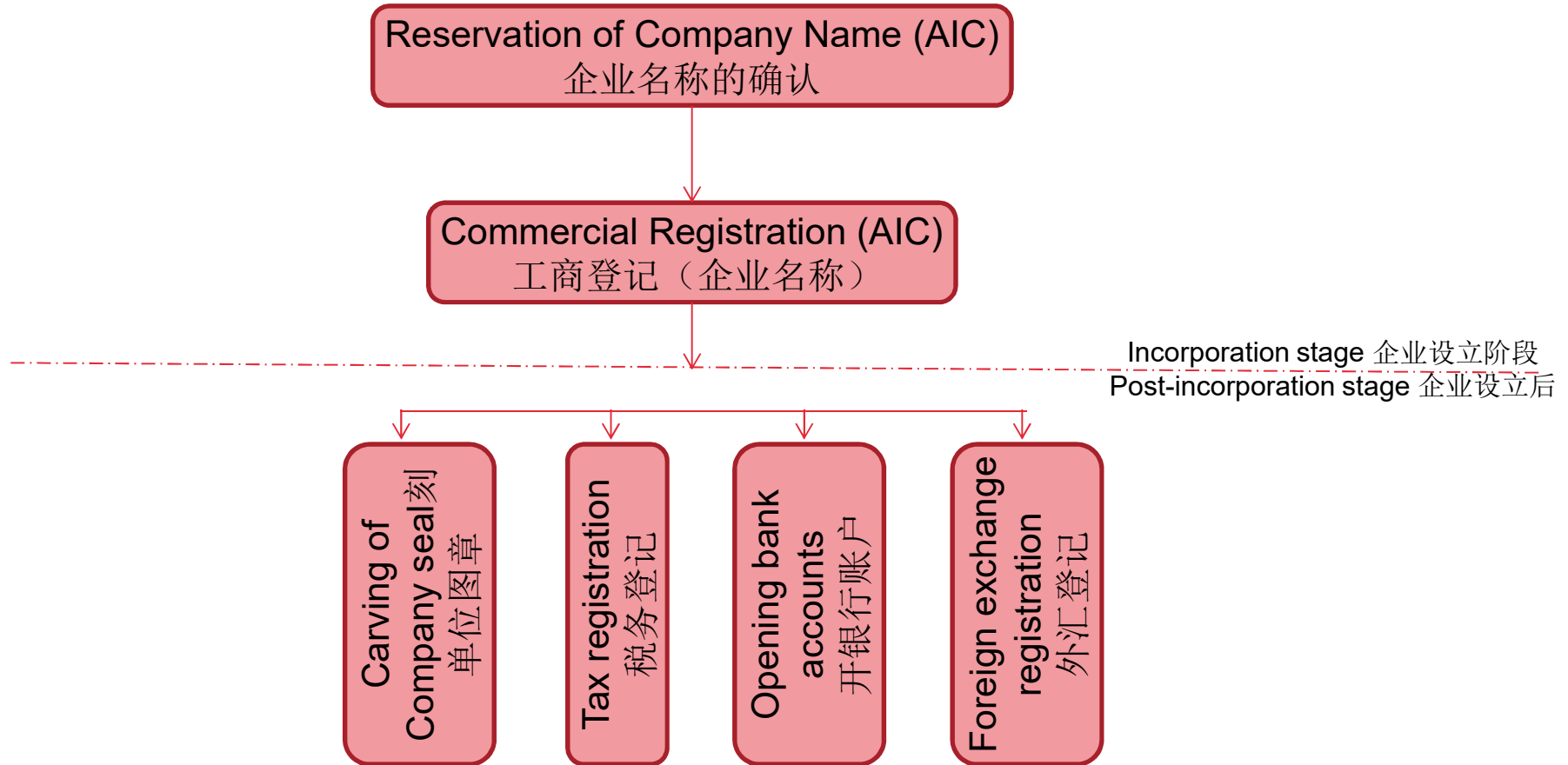
For Special Industries, they should get the approval instead of filing from SCOFCOM, which might take 20 working days.
对于特殊行业而言，需要从市商务委获取相关的批复、批文证书,费时约20工作日

No. 序号	Process of the establishment of foreign-invested enterprises 外商投资企业设立流程	Required time 所需时间
1	Prepared the application materials for the establishment of foreign-invested enterprises (Like: AOA, etc.) 准备外资企业设立的申报材料（如：章程等）	
2	Pre-approval of the company name 新设企业的名称预先核准	5 working days 5个工作日
3	Go through the formalities for registration and filing in relevant department of Shanghai Municipal Commission of Commerce 报注册商务部门备案	10 working days 10个工作日
4	After the approval of the filing, obtain the receipt of the company 商务部门备案同意后，领取外商投资企业设立备案证明	2 working days 2个工作日
5	After obtain the receipt of the company, handle the establishment registration of the company in Industry & Commerce Administration 获得商务部门同意企业设立的备案证明办理工商设立登记事项	10 working days 10个工作日
After obtain the Business License of the company, the following steps can be done: 获得工商部门颁发的《营业执照》后，可办理以下步骤： Go through the Formalities for chop registration and filing in Shanghai Public Security Bureau 企业印章刻制及公安部备案		
6	<ul style="list-style-type: none"> Apply for the establishment registration of the company in Shanghai Municipal Bureau of Local Taxation 办理税务登记信息备案手续 	<ul style="list-style-type: none"> Apply for the establishment registration of the company in Shanghai Administration of Foreign Exchange 办理企业外汇登记（备案）手续 Open foreign currency capital account (which can be handled in the bank) – The time is prescribed by the bank 开设外币资本金账户（外币资本金开户银行办理） -- 银行规定的工作时间
7	<ul style="list-style-type: none"> The Registration of Foreign Trade Operators (according to business needs) Customs Registration Certificate (according to business needs) 	<ul style="list-style-type: none"> Overseas registered capital import (which can be handled in the bank) 境外注册资金汇入（企业开户银行办理）

Note: Above the time limit to declare the materials are complete, the government departments officially began to accept the calculation.
注：以上办理时限，以申报材料企业，各政府部门正式开始受理起计算

Task List for the Incorporation of FE

外国企业设立流程



Summary 总结

- This PPT covers the taxation topic with regard to two main domains, i.e. FIE and FE, which are divided according to legal status. WFOE and JV are the most common vehicles of FIE, while the availability of new *investment* vehicle “Foreign Invested Partnership Enterprise (FIPE)” brings good news for foreign law firms, accounting firms, private equity and venture capital Investors.
- 本PPT的税务以是否具备法人资格，分成外商投资企业(FIE)与外国企业(FE)两部分谈。外商投资企业中外商独资企业与合资企业尤为常见，而新出台的外商投资合伙企业形式也受外国律所、会计师事务所、私募股权和风险投资商的青睐。
- It is advisable for foreign investors to carry out tax planning in advance of establishing FIEs and FEs, which are subject to VAT, CIT, IIT and so on in China, especially for relevant tax treaty/tax arrangement.
- 外商在设立外商投资企业或外国企业前，建议考虑增值税、企业所得税、个人所得税等的税务筹划，尤其是对相关中外税收协定进行研究以确定企业架构。
- Process of the establishment of FIE has been largely facilitated by shifting from approval to filing procedures.
- 外商投资企业设立由审批制改为备案制，大大便捷了整体设立流程。

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- 上海市商务委跨境经验人才培训 – 境外投资税务实务班（安永）相关资料
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