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领跑者, 做百年企业

**价值观:**  
永远以客户为中心, 专正  
快

**MISSION:**  
To add value to our  
clients and to be respected  
tax advisers.

**VISION:**  
To be a sustainable leader  
in the financial services  
industry for 100 years.

**VALUES:**  
Always being customer-  
centered;  
Being professional,  
honest and efficient.



Shanghai



Qingdao

## P1 您需要注意的财税新政...

### *Tax regulations that you should pay attention to...*

1. 为优化税收营商环境, 完善纳税信用体系, 国家税务总局发布《关于纳税信用管理有关事项的公告》(国家税务总局公告 2020 年第 15 号), 文件规定:

(1) 非独立核算分支机构可自愿参与纳税信用评价。本公告所称非独立核算分支机构是指由企业纳税人设立, 已在税务机关完成登记信息确认且核算方式为非独立核算的分支机构。

(2) 自开展 2020 年度评价时起, 调整纳税信用评价计分方法中的起评分规则。近三个评价年度内存在非经常性指标信息的, 从 100 分起评; 近三个评价年度内没有非经常性指标信息的, 从 90 分起评。

(3) 纳税人对指标评价情况有异议的, 可在评价年度次年 3 月份填写《纳税信用复评(核)申请表》, 向主管税务机关提出复核,

1. In order to optimize the taxation and business environment and improve the taxation credit system, the State Administration of Taxation issued the Circular on Matters Relating to Administration of Taxation Credit (SAT [2020]No. 15), which stipulates:

(1) **Non-independent accounting branches may voluntarily participate in taxation credit evaluation.** The "non-independent accounting branch" as mentioned herein refers to a branch which is established by a corporate taxpayer, has non-independent accounting status and has confirmed registration information with the tax authority.

(2) The base-scoring rules in the taxation credit scoring method will be adjusted from the beginning of the 2020 annual evaluation. **Where there is non-recurrent index information in the recent three evaluation years, the evaluation shall start from 100 points; where there is no non-recurrent index information in the recent three evaluation years, the evaluation shall start from 90 points.**

(3) **Where a taxpayer disagrees with the evaluation, it may fill in the Application Form for Taxation credit Re-evaluation in March in the year following the evaluation and submit it to the competent tax authorities for review, and the latter shall review**

主管税务机关在开展年度评价时审核调整，并随评价结果向纳税人提供复核情况的自我查询服务。

(4) 本公告自 2020 年 11 月 1 日起施行。

2. 财政部 税务总局关于明确无偿转让股票等增值税政策的公告（财政部 税务总局公告 2020 年第 40 号）规定：纳税人无偿转让股票时，转出方以该股票的买入价为卖出价，按照“金融商品转让”计算缴纳增值税；在转入方将上述股票再转让时，以原转出方的卖出价为买入价，按照“金融商品转让”计算缴纳增值税。

3. 中华人民共和国外交部、国家移民管理局于 2020 年 9 月 23 日发布《关于允许持三类有效居留许可外国人入境的公告》，主要内容如下：

(1) 自 2020 年 9 月 28 日零时起，允许持有效中国工作类、私人事务类和团聚类居留许可的外国人入境，相关人员无需重新申办签证。

(2) 如外国人持有的上述三类居留许可于 2020 年 3 月 28 日零时后过期，持有人在来华事由不变的情况下，可凭过期居留许可和有关材料向中国驻外使领馆申办相应签证入境。上述人员需严格遵守中方防疫管理规定。

and make adjustment as the case may be in the annual evaluation and provide self-inquiry service in relation to the review status along with the evaluation results to taxpayers.

(4) This Circular shall take effect from November 1, 2020

2. The Circular of the Ministry of Finance and the State Administration of Taxation on Value-Added Tax policies in Relation to Voluntary Conveyance of Stocks (SAT MOF [2020]No. 40) provides:

**When a taxpayer transfers stock for free, the transferor shall pay VAT subject to the regulations for "transfer of financial instruments", taking the purchase price of the stock as the selling price.**

**When the transferee re-transfers the above-mentioned stock, the selling price of the original transferor shall be regarded as the purchase price, and the VAT shall be calculated according to the regulations for "transfer of financial instruments".**

3. The Ministry of Foreign Affairs of the People's Republic of China and the National Immigration Administration issued the Notice on Entry of Foreigners with Three Types of Residence Permits on 23 September 2020, the main points being as follows:

(1) **Effective from 0:00 of September 28, 2020, entry of foreigners with valid Chinese Permits for work, private affairs and family reunion will be allowed without the necessity of applying for new visas.**

(2) **If a permit of the above three categories held by a foreigner expires after 00:00 of March 28, 2020, the holder thereof may apply for visa to the Chinese embassies or consulates abroad by presenting the expired permit and relevant materials, provided that the purpose of the entry to China remains unchanged, and the holder of such visa strictly abide by China's regulations on epidemic prevention and control.**



## P3 百福润财税 2020 年 BBQ 活动 Brighture BBO in 2020

经过了春生夏长，我们迎来了金秋九月，天高气爽，百果飘香，为了可以让同事们更好的放松身心，百福润财税于 2020 年 09 月 26 日举办了“秋高气爽·相约自然”的主题团队活动。组织同事一起去会海湾度假小镇，欣赏美景，品味美食，放飞心情。



8:30，当清晨的阳光透过云层洒向大地，大家就以饱满的精神到达了约定地点，全体集合完毕，迎着朝阳，驱车前往风景秀丽的会海湾度假小镇。

一路欢歌笑语，转眼间我们就到达了目的地。温柔海风迎面吹来，朵朵浪花跳着优美的舞步，像欢迎着我们的到来...

在这碧海蓝天间，为了考验和增进团队队员之间的默契，我们开始了有趣的拓展游戏。全员随机分了 2 队，一队是“男神女神队”，另一队是“Enjoy 队”。



首先进行的是“一圈到底”游戏，在游戏中，不得用手传递呼啦圈，这给游戏增加了难度。为了让大家在比赛中有更好的表现，每队可以提前练习。练习的过程中大家通过身高、传圈的方式来测试怎样才能更快的传递；游戏中大家通过“S 型”扭动、套圈等各种高难

Theme group activities of BRIGHTURE were held in Hui Harbor Holiday Resort on September 26, 2020 in the golden season of harvest and refreshment.



Colleagues gathered at 8:30 in the morning and set off for Hui Harbor Holiday Resort amid laughter and songs. We soon found ourselves at the beautiful seaside tourist destination with gentle breezes.

We reached our destination with singing and laughing all the way. The gentle sea breeze is blowing on the face, and the waves are dancing gracefully, like welcoming us...

To test the teamwork spirit of the colleagues, adventure games were played by all the people present in two teams: “Gods and Goddesses” and “Enjoy”.

The first game was “Hula-hoop relay”, in which a hula hoop was passed from one colleague to another without being touched by hand. This is a difficult challenge and warm-up exercises were conducted to study and develop the right and efficient methods for the game. Great enjoyment of the challenge was experienced through various difficult body movements of the contestants, and eventually, “Team of Enjoyment” became the winner.



## P4 百福润财税 2020 年 BBQ 活动 Brighture BBQ in 2020

动作传递呼啦圈，充满了挑战的乐趣。最终，“Enjoy 队”凭借着完美的配合，先积一分。

随后，我们进行了“同心击鼓”游戏，在这个游戏中，每队分为 2 组，每组 3 分钟，接力颠球击鼓，在 6 分钟时间内颠球数量多的获胜。在练习的过程中，大家通过球充气量的多少、拉绳方式等来寻找最稳的颠球办法；游戏中，大家齐心协力，合理分工。最终，“男神女神队”拿下一分。



在激烈的角逐之下，我们迎来了游戏的赛点。最后这一轮，则是队员体力的较量，我们以“团队接力赛”的方式，来赛出本次活动的优胜团队。接力赛每队派出 6 人进行接力，6 人接力跑完后，用时最少的团队获胜。游戏中每位队员挥洒汗水、拼尽全力，为团队贡献自己的力量。最终，“Enjoy 队”拿下这关键的一分，赢得了最终比赛的胜利。

游戏尽兴，饥肠辘辘。于是，大家自己动手进行海边烧烤。大家尽情放开，举杯畅饮，欢声笑语回荡在山海之间。酒足饭饱后，大家自由活动，沙滩排球，海边漫步等，每个人都在以自己最舒服的方式享受生活。

回顾这一帧帧照片，时而让人捧腹，时而令人感叹。百福润大家庭的友爱和温暖让每一位百福润家人永志心间。团结、友爱、活力、担当，是我们一直的追求；没有完美的个人，只有完美的团队，是我们不变的信念！

秋高气爽，拥抱自然，我们相约，下次再见！

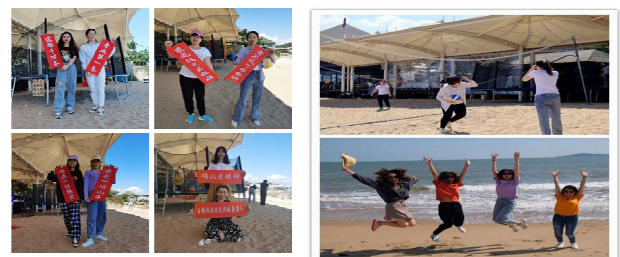
The second game was “drum-beating”. Each team was further divided into 2 groups, and each group was to make a ball beating a drum for 3 minutes. People tried various ways in the warm-up exercises to find the best method to keep the ball bouncing consistently on the drum. Finally, “Gods and Goddesses” Team beat the other.

Then, our games came to the last round: “relay race”. Each team selected 6 people for the relay. At the end, “Enjoy” Team prevailed, thus becoming the winner of the total games.

The games ended with all the colleagues in hunger, and an ensuing barbecue pushed our activities to a climax.



After the meal, people relaxed and enjoyed themselves on the beach in various fashions.



These pictures witness the friendship and solidarity of the Brighture Family. No one is perfect but a perfect team, this is our eternal faith.

We are looking forward to group activities in the future!



2020年9月24日19:00至20:00, 百福润财税通过直播的方式举行了2020年第8期老板沙龙活动, 沙龙主题为“小微企业财税优惠政策及纳税筹划”。

本期老板沙龙由百福润财税上海公司部门经理宋士青老师主讲, 宋老师在百福润财税有6年工作经验, 曾为多种类型的企业的管理层分享财税课程, 提供纳税筹划服务。

宋老师从税收优惠政策的盘点、解读、如何合理有效运用等方面进行了分享。

### 1. 小微企业的两个判定标准:

(1) 统计概念的判定标准:

根据2017年12月国家统计局印发的《统计上大中小微型企业划分办法》, 具体标准根据企业从业人员、营业收入、资产总额等指标, 结合行业特点制定。

(2) 税务概念的判定标准:

是指从事国家非限制和禁止行业, 且同时符合年度应纳税所得额不超过300万元、从业人数不超过300人、资产总额不超过5000万元(简记为“335”)等三个条件的企业。

2. 为促进小微企业的发展, 国家出台了多项小微企业的税收优惠政策:

(1) 企业所得税方面: 小型微利企业的应纳税所得额不超过100万元的部分, 实际税负率为5%; 超过100万元但不超过300万元的部分, 实际税负率为10%。

(2) 增值税:

对小规模纳税人月销售额10万元以下(含本数), 季度销售额30万元以下(含本数)的增值税小规模纳税人, 免征增值税。

The 8<sup>th</sup> Brighture Salon for 2020 was held through Live Broadcast from 19:00 to 20:00 on September 24, 2020 under the theme of “Fiscal preferential policies and tax planning for small and micro enterprises”.

The resource person for this lecture was Eileen Song, department manager of Brighture (Shanghai), who has six years' experience in Brighture and has provided fiscal trainings and tax planning services for the management of various enterprises.

Ms.Song's lecture covered the major points of the preferential fiscal policies, and the understanding and the approaches for making use thereof.

### 1. Two criteria for small and micro enterprises:

(1) Criteria based on **statistical** requirement:

Subject to the Measures for Determination of Large, Medium, Small and Micro Enterprises for Statistical Purpose issued in December 2017 by the National Bureau of Statistics, the criteria shall be based on such indexes as **the number of employees, business income and total assets** taking into account the characteristics of the industry.

(2) Criteria based on **taxation** requirement:

Enterprises engaged in businesses not restricted or prohibited by the state, with annual **taxable income not exceeding RMB 3 million, total employees not more than 300 and total assets within RMB 50 million.** (abbr. 355)

2. The State introduced many preferential fiscal policies to support small and micro enterprises, including the following:

(1) In relation to corporate income tax: For the part of taxable income of small and micro enterprises not exceeding RMB 1 million, the actual tax burden rate shall be 5%; for the part exceeding RMB 1 million but not exceeding RMB 3 million, the actual tax burden rate shall be 10%.

(2) VAT:

VAT shall be exempted for small-scale VAT payers with **monthly sales of less than RMB 100,000 (inclusive) or quarterly sales of less than RMB 300,000 (inclusive).**

### (3) 残保金:

自 2020 年 1 月 1 日起至 2022 年 12 月 31 日, 在职职工人数在 30 人(含)以下的企业, 暂免征收残疾人就业保障金。

### 3. 小微企业纳税筹划, 合理节税

(1) 关注临界点税负, 用对税收筹划方法: 临界点筹划方法很多, 常见的有递延收入法、固定资产加速折旧等。不考虑其他因素, 仅从提高税后收益角度来说, 不管哪种方法, 筹划成本和筹划前应纳税所得额的关系必须满足以下条件: 设筹划前应纳税所得额为  $X$  (大于 300 万), 若想将应纳税所得额降至 100 万元至 300 万元之间, 现支出费用  $Y$  万元 (假设税前能全额扣除) 则:  $X - 300 \leq Y < 16.67\%X + 5.56$

(2) 关注组织形式筹划法, 综合分析决策: 一定要根据企业的实际情况, 在综合考虑行业特点、生命周期、管理成本、融资难度、现金流量、企业信誉等因素的基础上, 分情形进行区别运用, 综合权衡利弊后, 根据自身情况择优选择。

百福润财税作为专业的服务机构, 可以根据企业的实际情况, 综合考虑企业及行业特点, 为企业量身定制合理的纳税筹划方案。

### (3) Employment security fund for the disabled:

Employment security fund for the disabled shall be exempted from January 1, 2020 to December 31, 2022 for an enterprise with total employee no more than 30 (inclusive).

### 3. Taxation planning and tax burden minimizing

(1) Pay attention to critical taxation point for tax planning: There are many tax planning methods based on critical point, including deferred income method and accelerated fixed assets depreciation method which are the most commonly used. Regardless of other factors, the relationship between the planning cost and the amount of taxable income before the planning must satisfy the following conditions from the perspective of increasing after-tax earnings only: Assume that the taxable income before planning is  $X$  (more than RMB 3 million), if the taxable income is to be reduced to between RMB 1 million and RMB 3 million and the expenditure in the current period is RMB  $Y$  (assuming that the pre-tax deduction can be made in full),

Then:  $X - 3,000,000 \leq Y < 16.67\%X + 5.56$

(2) Pay attention to organization form for tax planning: Enterprises must choose the most suitable organization form taking into account their actual situation after comprehensive weighing the advantages and disadvantages in respect of industry characteristics, life cycle, management cost, financing difficulty, cash flow, corporate reputation and other factors.

As a professional service agency, Brighture can customize reasonable tax planning schemes for enterprises according to the actual situation of enterprises and considering the characteristics of enterprises and industries comprehensively.

P6  
百福润财  
税上海  
老板  
沙龙  
Brighture  
Salon in  
Qingdao

Key  
Date

线下沙龙: 百福润财税 2020 年 第 9 期老板沙龙

主题: 高新技术企业认定及科技项目补贴

时间: 2020 年 10 月 30 日周五 19:00 至 20:00

Offline Salon: The 9<sup>th</sup> Brighture Salon in 2020  
Topic: Recognition of high-tech enterprises and subsidies for science and technology projects  
Time: 19:00-20:00, October 30, 2020(Friday)

# 百福润财税解答客户热点问题

## Brighture's answers to hot topics

**Q:** 公司的股东以个人名义从银行贷款，用于公司经营，产生的利息费用，可以在所得税前扣除吗？

**A:** 根据《河北省地方税务局关于 2010 年度企业所得税汇算清缴若干业务问题的公告》（河北省地方税务局公告 2011 年第 1 号）第十二条关于个人贷款、企业使用发生利息的扣除问题规定：“**对个人将自己的资产作抵押向金融机构贷款、企业使用（个人与企业之间必须有相关的协议）发生的利息，在确认该项贷款直接划入企业银行账户，利息支出由企业账户划出后，允许企业在计征所得税时扣除。**公司股东以个人名义从银行贷款，虽资金用于企业生产经营，**但银行出具的利息票据上显示付款人为个人，原则上不能在企业所得税税前扣除。**建议客户朋友在与银行签订贷款合同时，可在资金使用用途一栏中注明企业使用，并与银行协商，**将银行贷款直接汇入企业的公司账号。**”

**Q:** In case the shareholders of the company borrowed money from the bank in their own name but the money borrowed is used for company operation, can the interest expenditure be deducted before corporate income tax?

**A:** Article 12 of the Notice of Hebei Provincial Local Taxation Bureau on Issues Concerning Final Settlement of 2010 Enterprise Income Tax (Notice of Hebei Provincial Local Taxation Bureau [2011]No. 1) on the deduction of interest incurred by an individual for loans which are used by enterprises provides: **Where an individual borrows money from a financial institution using his personal property as collateral but the money is for the use of an enterprise (there must be an agreement between the individual and the enterprise), the interest incurred can be deducted before corporate income tax, provided that there is concrete evidence proving that the money borrowed is directly paid to, and the interest is paid from, the corporate account. Where the shareholders of a company borrow money from the bank in the name of individuals and the interest note issued by the bank shows that the payer is an individual, such interest, in principle, cannot be deducted before corporate income tax although the money is used for the operation of the enterprise. It is suggested that when our clients sign loan contracts with the bank, it shall be indicated in the column for the purpose of the fund that the loan is for the use of the enterprise, and negotiate with the bank to pay the loan directly into the corporate account.**

P7  
百福润财税同仁  
司龄：

- 陈佳静（国内一部）  
-入司 3 周年

## Work Anniversary at Brighture:

- Lareina Chen ( Chinese Dept.1)  
-3 Years

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