Baker McKenzie FenXun.
奋讯·贝克麦坚时



Ms. Guo provides comprehensive tax services to multinational and domestic companies across various industries. She specializes in PRC tax planning and advisory related to mergers and acquisitions, corporate restructurings, transfer pricing, and cross-border investments. She also has extensive experience in tax controversy matters, including complex tax and transfer pricing disputes.

Professional experience

Representative Legal Matters

- Provided a full spectrum of China tax services to a US multinational company with respect to the indirect equity transfer of its China subsidiary arising from its business combination with a European multinational and multiple prior restructuring steps, including assessing the China tax implications, formulating the Bulletin 7 reporting strategy, preparing the reporting package, handling the filing process, and addressing inquiries from tax authorities.
- Provided transfer pricing and tax planning advice to a US retail company in connection with its proposed expansion to offer sourcing services to a China-based retail entity.
- Supported a US multinational in aligning the high and new technology enterprise (HNTE) status of its Chinese subsidiaries with its global transfer pricing policy, and in planning and implementing a royalty optimization plan involving multiple China subsidiaries.
- Advised a US multinational on optimizing China tax outcomes for a series of internal restructurings involving direct and indirect equity transfers of several Chinese subsidiaries ahead of a corporate spin-off, including tax implementation of the restructuring steps.

Location & Information

Shanghai

+86 21 6105 5924

Practices

Tax

Languages spoken

English / Mandarin

- Assisted a global oncology-focused pharmaceutical company with respect to its intercompany IP transfer project, cost contribution agreements and the application for bilateral advance pricing arrangement on the cost contribution agreements.
- Provided China tax advisory services for an offshore charitable trust with a complex structure involving both Chinese and foreign assets.
- Assisted a multinational corporation in managing an internal whistleblower case involving invoice compliance issues of its China subsidiary, and in rectifying related tax non-compliance matters.
- Coordinated tax projects across 30+ jurisdictions for a Singapore-headquartered multinational, covering both direct and indirect tax issues.
- Advised a leading Chinese internet company on tax-efficient structuring for its outbound investment shareholding structure.

Qualifications & Education

Admission

- PRC, 2024

Education

- Leiden University (LL.M. in Taxation) (2015)
- Wuhan University (LL.M. in Economic Law) (2015)
- Sun Yat-sen University (LL.B.) (2012)

Baker & McKenzie LLP is a member of Baker & McKenzie International.