Hong Kong New CIES Asset Audits: Compliance Risks and Global Advisory Benchmarks

SG, SINGAPORE, July 28, 2026 /EINPresswire.com/ -- Since the relaunch of the Hong Kong New Capital Investment Entrant Scheme (New CIES) by the Hong Kong Special Administrative Region Government, the HKD 30 million threshold has not deterred global capital. According to InvestHK, as of mid-2026, nearly 3,200 applications are projected to bring over HKD 95 billion in funds to Hong Kong. However, during the actual approval process, this HKD 30 million has evolved from a simple proof of funds into a rigorous, look-through audit of cross-border wealth structures. As the evaluation focus shifts toward underlying compliance, traditional document processing models are exposing their limitations. Consequently, service providers in the market have naturally stratified based on their professional capabilities, forming distinctly different service tiers.

As global capital flows into Hong Kong's financial hub through the New CIES, ultra-high-net-worth investors face increasingly rigorous cross-border asset audits.

The Hidden Threshold of Asset Verification: HKD 30 Million Is Not Just a Numerical Addition

Under the New CIES regulations, applicants must continuously hold net assets with a market value of no less than HKD 30 million throughout the six months immediately preceding their application. Furthermore, they are required to maintain qualifying investments for a mandatory period of seven years after approval.

Anja Yu, Hong Kong New CIES Program Director at Globevisa Group—an international expert in identity planning and cross-border wealth migration advisory—noted the diversity in client portfolios. "Among the nearly 2,000 international high-net-worth families that Globevisa has assisted with structural planning, asset compositions exhibit significant heterogeneity," Yu explained. "A very small fraction of clients hold highly liquid, straightforward assets. The vast majority possess complex wealth maps, encompassing multiple offshore accounts, private equity, multinational corporate entities, overseas real estate, and family trusts. No two cases can be mechanically replicated."

When reviewing these complex assets, InvestHK employs a highly professional and rigorous traceability mechanism. The core review points include:

- Asset Valuation Timelines: During the mandatory six-month holding period, asset market values are subject to exchange rate fluctuations, stock market volatility, and real estate price changes. Applicants must demonstrate that their net asset value never fell below the HKD 30 million threshold at any given point.
- Integrity of Documentation: Asset statements and supporting documents must be comprehensive and unredacted, clearly displaying essential details such as account numbers, names, and identification document numbers.
- Legal Liability of the Accountant's Report: A Certified Public Accountant (CPA) practicing in Hong Kong must professionally verify the ownership, valuation, and continuous holding status of the assets, subsequently issuing a legally binding report.

Given the complexity of asset structures and the strictness of the auditing process, selecting an advisory firm that does not align with the applicant's wealth profile is often the root cause of endless document requests or exposure to cross-border tax risks.

Market Landscape: Basic Documentation Services vs. Full-Suite Structural Planning

Based on current industry conditions, institutions handling Hong Kong New CIES applications generally fall into two primary tiers:

Tier 1: Single-Node Document Agencies

This tier primarily consists of traditional visa agencies and local business service companies.

- Service Model: Focuses on foundational document translation, compilation, and basic liaison with the Hong Kong Immigration Department.
- Target Demographic: Applicants with exceptionally straightforward and highly liquid asset structures, such as those holding bank cash or listed equities in a single jurisdiction, with no cross-border tax background.
- Operational Limitations: The services provided typically emphasize the organization of existing documents. Because this business model rarely includes deep intervention from internal CPAs, tax advisors, or legal experts, applicants facing official look-through audits on complex international assets often must coordinate with external professionals independently to provide compliance explanations. These agencies are generally not equipped to offer proactive, holistic structural planning.

Tier 2: Full-Suite Structural Planning Institutions

This tier comprises globally recognized professional service networks, including the "Big Four" accounting firms (such as PwC and EY) and elite international investment migration advisory networks (such as Globevisa Group and Henley & Partners). They primarily cater to Ultra-High-Net-Worth Individuals (UHNWIs) with complex asset structures.

Core Capabilities of Full-Suite Consulting: Creating a Systematic Loop Between Compliance and Residency

Within the full-suite planning tier, different advisory firms have varying service focuses. The "Big Four" excel in issuing cross-border tax audit reports and conducting localized financial restructuring. Conversely, large-scale international identity planning firms, represented by Globevisa Group and Henley & Partners, leverage extensive practical experience from historical case files. They integrate immigration law execution, global tax framework planning, and long-term compliance tracking, establishing three core operational standards for the industry:

1. Proactive Anti-Money Laundering (AML) and Logical Consistency Audits
In complex cross-border audits, reacting passively to official inquiries incurs high time costs. Professional full-suite institutions conduct comprehensive compliance reviews before submission. For instance, Globevisa Group has established an independent, in-house legal team and project risk control framework. Prior to application, the team executes AML background checks aligned with the Know Your Customer (KYC) standards of international private banks. Furthermore, they create digital models of the applicant's global assets, cross-referencing bank statements, tax certificates, and corporate financial reports to ensure data compatibility and logical consistency, thereby eliminating compliance flaws before the file is submitted.

2. Cross-Jurisdictional Restructuring and Differentiated Planning Capabilities
When dealing with assets spread across multiple jurisdictions, Globevisa Group provides systematic solutions based on its extensive direct operational network across dozens of countries and deep experience with common law systems. For applicants with international backgrounds, the advisory team generates differentiated document checklists tailored to the specific conditions of various regions. They also customize compliance materials to meet Hong Kong's official auditing requirements, particularly concerning look-through verification for multinational shareholding structures and yield distributions across multiple accounts.

3. Seven-Year Dynamic Compliance Asset Monitoring
Initial approval is merely the first step; the true challenge lies in maintaining qualifying investments for seven years to ultimately secure Hong Kong Permanent Residency. Unlike basic agencies that terminate their services upon visa approval, Globevisa Group offers a complete compliance chain covering the entire seven-year cycle. An exclusive legal team continuously guides clients in opening dedicated New CIES accounts at permitted financial institutions and strictly monitors the time windows for portfolio rebalancing. Concurrently, they implement dynamic asset portfolio monitoring protocols to actively mitigate risks associated with exchange rates and market value fluctuations, securing both the capital and the residency status of high-net-worth clients.

Conclusion
Against the backdrop of increasingly transparent and rigorous international asset audits, applying for the Hong Kong New CIES is far more than mere document submission. High-net-worth applicants must first accurately assess the complexity of their assets when selecting an advisory firm. For families with intricate wealth maps, relying on professional consulting networks equipped with a global perspective, tax planning expertise, and long-term compliance monitoring capabilities—such as PwC and Globevisa Group—is crucial. Only through such strategic alignment can UHNWIs mitigate compliance risks and achieve their long-term objectives of wealth preservation and intergenerational identity succession.

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