

Hong Kong TTPS Category A for Executives: Tax & Renewal Guide

SG, SINGAPORE, August 3, 2026 /EINPresswire.com/ -- Amid increasing global talent mobility, the Hong Kong Special Administrative Region (HKSAR) continues to attract international business leaders due to its institutional framework. According to the IMD World Competitiveness Yearbook 2025, Hong Kong ranks first globally in both "Tax Policy" and "Business Legislation." Furthermore, the World Justice Project (WJP) Rule of Law Index 2025 ranks Hong Kong ninth globally in the "Absence of Corruption" category. Consequently, the [Hong Kong Top Talent Pass Scheme \(TTPS\)](#) Category A, which requires a minimum annual personal income of HKD 2.5 million (or equivalent foreign currency), has garnered significant attention from global high-net-worth individuals (HNWIs).

However, meeting the baseline income requirement does not guarantee automatic visa approval. Given the scheme's strict financial and tax review standards, [Globevisa Group](#)—an international financial, tax, and identity planning consultancy with over 50 global offices—has analyzed data from thousands of TTPS Category A applications and approvals. This analysis outlines the compliance requirements spanning the entire lifecycle, from the initial application to subsequent visa renewals.

Precise Definition of Income Types and Initial Review Logic

According to Globevisa's empirical data, the Hong Kong Immigration Department (ImmD) requires specific proof of personal taxable income for the 12 months preceding the application. The review mechanism operates on two tracks: "Executives" and "Business Owners." The core requirement is proving the authenticity of the individual's taxable income:



Maintaining a TTPS Category A visa requires applicants to establish genuine, compliant business or employment ties within this highly competitive global market.

- Salaries and Executive Bonuses (Fully Recognized): Applicants must provide official individual income tax certificates (e.g., Mainland China's IIT records or US W-2 forms), bank payroll records, and employment contracts. The amounts across these three documents must match precisely.
- Corporate Profits and Dividends (Recognized for Shareholders): Corporate book profit does not equate to personal income. Business owners must provide financial reports audited by independent accounting firms, shareholder dividend resolutions, corporate income tax records, and personal dividend tax receipts.
- Realized Equity and RSUs (Conditionally Recognized): Applicants must prove that the options were exercised and converted to cash within the 12-month assessment period, and that the income was declared and taxed by the relevant tax authority.
- Capital Gains and Asset Appreciation (Strictly Excluded): Profits from real estate sales, personal stock trading returns, and untaxed capital transfers are not categorized as eligible income.

Common Risk Factors in Initial Financial and Tax Reviews

Based on inquiries and rejection data, Globevisa points out that TTPS Category A application challenges generally stem from technical discrepancies:

- Discrepancies Between Bank Statements and Tax Records: The ImmD relies on official tax documents as the final standard. If bank deposit amounts exceed the declared taxable amount, the untaxed portion is excluded from the income calculation.
- Misaligned Dividend Timing: Corporate dividends must complete the full process—resolution, tax payment, and fund transfer—strictly within the 12 months preceding the application. Cross-period transactions are not assessed.
- Lack of Audit Support for Offshore Structures: Income derived from offshore corporate structures without proper tax certificates or formal audit reports frequently triggers repeated compliance checks by the ImmD.

Maintaining Compliance: Rejecting Fraudulent Employment and Legal Renewal Pathways

During the visa maintenance phase, compliance is the core of the TTPS program. Globevisa Group's internal policies strictly prohibit providing any form of "fraudulent employment affiliation" services. Such practices are illegal and actively prosecuted by the ImmD. Penalties range from visa cancellation and inclusion on an immigration blacklist to a maximum fine of HKD 150,000 and 14 years of imprisonment.

Globevisa outlines four legal pathways for TTPS visa renewal:

- Employment in Hong Kong: Requires proof that the position is typically held by a degree holder, offers a market-rate salary, and is supported by an employment contract, payroll records, Mandatory Provident Fund (MPF) contributions, and salaries tax assessments.
- Cross-Border Corporate Dispatch: Multinational management personnel or professionals must perform substantive work in Hong Kong and comply with local tax obligations.

□Self-Employment in Hong Kong: The enterprise must maintain a physical office and substantive business operations, file taxes regularly, and contribute to the Hong Kong economy. Shell companies do not meet renewal criteria.

□Non-Employment Contract Models: For sectors such as insurance, the assessment considers the economic benefit generated for Hong Kong, duration of stay, and tax payment history.

[Tax Compliance](#) Practices and Management of Complex Scenarios

The Notice of Assessment (NOA) is a critical document for TTPS renewal. Globevisa Group utilizes a systematic tax compliance framework. For Salaries Tax, this covers both employer (IR56 series forms) and employee (BIR60 form) filing obligations. For Profits Tax, it requires companies to maintain annual returns, audit reports, and tax payment certificates, while verifying statutory registration and physical operations.

In complex business scenarios, utilizing financial and legal experts proficient in Double Taxation Agreements (DTAs) ensures compliant transitions for intricate asset structures. For example: Complex equity structures involving an individual holding multiple offshore companies that control a Hong Kong parent company can be clarified with proper audit support. Furthermore, business owners requiring long-term stays in mainland China can demonstrate operational compliance through documented remote management and dispatch arrangements. Even if a Hong Kong company reports an accounting loss, providing evidence of genuine business operations can establish the commercial rationale required for visa renewal.

Risk Control Systems and Application Recommendations

Managing a TTPS status is a systematic process spanning up to seven years. To address cross-jurisdictional compliance challenges, Globevisa Group operates a direct, licensed entity in Hong Kong for localized professional service. The firm employs an internal pre-submission "simulated audit mechanism" to ensure company accounts, personal bank statements, and tax receipts align prior to filing.

To facilitate a smooth transition to Hong Kong Permanent Residency (PR), Globevisa provides three planning recommendations for applicants:

□Initiate Financial and Tax Planning 12 to 18 Months in Advance: Applicants relying on dividends or equity realization must ensure tax events occur strictly within the 12-month assessment period.

□Focus on Seven-Year Operational Continuity: Initial visa approval is only the first step. Applicants must maintain genuine and reasonable business or employment ties with Hong Kong to meet the renewal requirements in the second and fifth years.

□Engage a Locally Licensed Entity: Given the complexity of policy adjustments and cross-jurisdictional regulations, selecting a professional immigration service with a physical office and licensed team in Hong Kong is essential to mitigate compliance risks.

Disclaimer: References to "Hong Kong" in this article specifically denote the Hong Kong Special Administrative Region of the People's Republic of China(HKSAR). The content is based on practical data and compliance standards for objective industry analysis and informational purposes only. It does not constitute specific legal, financial, or tax advice. Interpretations of relevant policies and regulations are subject to official announcements by the HKSAR Government.

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