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Hong Kong stamp duty group relief: threshold to fall from 90% to 75%

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A bill gazetted on 2 October 2026 would let groups claim stamp duty relief on intra-group transfers at 75% common ownership instead of 90%, for instruments executed from 25 February 2026.

Country reference

- Country: Hong Kong (planned expansion country)
- Authorities: Inland Revenue Department (IRD); Financial Services and the Treasury Bureau (FSTB)
- Topic: Stamp duty relief for transfers between associated bodies corporate
- Key date: Bill gazetted 2 October 2026; first reading 14 October 2026; applies from 25 February 2026 if passed
- Law: Stamp Duty (Amendment) (No. 3) Bill 2026

What the bill does

- Today, two companies are associated only if one owns at least 90% of the other's issued share capital, or a third company owns at least 90% of each.
- The bill lowers the threshold to 75%.
- Ownership will be tested on beneficial interests and voting rights, direct or indirect, not only issued share capital.
- So entities without share capital, such as limited liability partnerships and companies limited by guarantee, can qualify.

Timing

The bill is due for first reading and the start of the second reading debate on 14 October 2026. If passed, it applies to instruments executed on or after 25 February 2026, the date of the 2026-27 Budget.

Why it matters

- Hong Kong stamp duty on property and shares can be substantial, so relief often decides whether an internal restructuring is viable.
- Joint ventures and groups with minority partners between 75% and 90% will gain access to relief.
- Transfers executed since 25 February 2026 may qualify retroactively.

Other stamp duty changes in 2026

- The Stamp Duty (Amendment) (No. 2) Bill 2026 was passed in July 2026.
- The Policy Address proposes a waiver of up to HK$20,000 for home purchases by families with newborns.

What to do now

- Review planned property or share transfers within groups at 75% to 90% ownership.
- Keep records of transfers executed since 25 February 2026 for a possible claim.

Our take

This is a practical fix for modern group structures. Groups holding Hong Kong property through joint ventures should revisit restructuring plans once the bill passes.

Sources

- IRD: Stamp Duty (Amendment) (No. 3) Bill 2026 to be gazetted (29 September 2026)
- IRD: What's New

Important. This summary is for general information and is not tax, legal or financial advice. It is based on public Inland Revenue Department publications and may be incomplete or out of date. The official legislation and guidance prevail; check the official text before acting.

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