

Advanced Tax Programme (ATP)

Programme Objective:

- Offers rigorous training on a wide range of core subjects covering: Tax Policy, Legal Framework, Singapore Individual and Corporate Income Tax, Tax Treaties, Transfer Pricing, International Tax Planning and Goods and Services Tax. The elective component offers modules on Regional (China & India) and US Tax, Tax Incentives, Tax Fraud & Investigation, and Stamp Duty
- Conducted by senior tax professionals from the Big 4 international accounting firms, the industry and tax experts from IRAS.

Programme Structure

ATP candidates will have to complete all the core modules making up 14 units of credits and take 2 of the elective modules that are worth 1 unit of credit each. Candidates are to complete 16 units of credits in total. Each unit of credit constitutes up to 9 hours of contact time. Online/In-person delivery on coursework is conducted twice a week on a weekday night and/or Saturday mornings, over a period of approximately 10 months.

There will be an assessment grading for each module, typically comprising of class participation, quiz/assignment and exam. Candidates must achieve at least 60% attendance to qualify for the final examination. There will be a 1-week reading period for candidates to prepare for the examinations.

CORE MODULES		Units of Credits
ATP 101 & 102	Tax Policy, Administration and Compliance Legal Framework of Taxation	2
ATP 103	Taxation of Individuals	2
ATP 104 & 105	Taxation of Corporations (Law) Taxation of Corporations (Practice)	4
ATP 106	Tax Treaties & Transfer Pricing	2
ATP 107	Goods & Services Tax	3
ATP 108	International Tax Planning	1
ATP 109	International Tax Developments	1
Total Core Units		15
ELECTIVE MODULES#		Units of Credits
ATP 110	Regional (China & India) and US Taxation	1
ATP 111	Tax Incentives (Financial & Non-Financial Sectors)	1
ATP 112 & 113	Fraud and Investigation Stamp Duty	1

Admission Criteria

The ATP is intended for those who wish to upgrade their skills and knowledge for their professional career in taxation. Entry to the ATP is on a competitive basis. Candidates should fulfil the following,

- i. at least 3 years of relevant working experience in tax
- ii. graduates from a recognized university or possess relevant professional qualification (ACCA and/or CPA).
- iii. Attended and passed Tax Academy's Income Tax Programme Level 2

Tax Academy will consider exemptions for (iii), on a case-to-case basis if participants have met the following criteria:

- at least 8 years working experience in tax
- Accredited Tax Practitioner with SCTP

All applications will be subject to shortlisting.

Graduation

Candidates who successfully complete the ATP will be awarded a certificate by Tax Academy.

Under a collaborative agreement between Singapore University of Social Sciences (SUSS) and Tax Academy, ATP graduates who meet SUSS' admission requirements, will be admitted to SUSS' Masters in Taxation (MTax) Programme with credit exemption of four courses.

Course Fees

ATP Full Programme (9 core and 2 elective modules)

S\$11,118.00 (inclusive of GST.)

- *Fees include course materials and written examination fee for first sitting.*
- *Overseas participants who in their business capacity belong overseas and are sponsored by overseas employers, will pay fees excluding GST.*

NOTE: Please ensure that you have read and understood the [Terms and Conditions](#) for courses before you register. Photographs and footage may be taken during the course/event. These will be used by Tax Academy for marketing and publicity in our publications, website and social media platforms.

Subsidies/Grants

Self-funded individuals may apply for SkillsFuture Credit claim and Union Training Assistance Programme (UTAP) funding, subject to the respective conditions. Please visit the respective organisations' website for more information,

[Home | Myskillsfuture.gov.sg](http://myskillsfuture.gov.sg)

[Union Training Assistance - Employment and Employability Institute](#)

Course Schedule

Please visit our website for the updated course schedule.

Registration

Candidates may complete the ATP registration form via the Tax Academy website, [Income Tax \(taxacademy.sg\)](#).

COURSE MODULE SYNOPSIS

CORE MODULES

ATP 101: Tax Policy, Administration and Compliance (6 hours)

This unit is made up of 2 parts.

Part 1 will provide participants with an overview of the underlying tax policies of Singapore tax regime, covering the considerations in our tax policy formulation, in particular the basic tenets of tax and fiscal policy and the rationale for the policy stance.

Participants will study in detail the structure of the Singapore Budget using recent budget materials and discuss the unique features of public finance in Singapore.

Part 2 will cover how the tax laws and policies are administered in Singapore from the tax administrator's perspective.

Participants will study how the tax policies formulated are actually implemented on the ground by the Government through IRAS, starting with the overall philosophy of the need to encourage voluntary compliance.

Participants will be given an appreciation of IRAS' approach to deliver excellent service and manage compliance. The various provisions in the tax law to enable Government to enforce compliance and how IRAS goes about using these provisions to raise the level of compliance will be covered.

ATP 102: Legal Framework (15 hours)

The Singapore Constitution requires that no tax be levied by or for the purposes of Singapore except by or under the authority of the law. The objective of this module is to give students an appreciation of the legal processes which mould tax practice.

Topics that will be covered include appeal processes to the Board of Review and the Courts, use of case law authorities and case law analysis, interpretation of tax statutes. The sessions will involve in-depth analyses of selected Singapore tax cases.

ATP 103: Taxation of Individuals (18 hours)

This module aims to provide participants with a working knowledge of the law and practice in the determination of an individual's tax liability from the undertaking of economic and investment activities and in the various types of remuneration such as benefits-in-kind and equity remuneration schemes.

ATP 104: Taxation of Corporations - (Law) (15 hours)

To enable students to have an in-depth understanding of fundamental legal principles which are important to the taxation of companies under the Singapore tax regime.

The following topics will be covered:

- (i) Tax residence and source of income
- (ii) Whether receipts are income or capital
- (iii) Whether expenditure is income or capital
- (iv) The various tests for deductible expenditure
- (v) Capital allowances
- (vi) Tax avoidance

ATP 105: Taxation of Corporations - (Practice) (18 hours)

The aim of this module is to help participants in their practical application of taxation law and principles, which they learned previously. It also aims to increase their knowledge and understanding of the taxation issues commonly raised by businesses and corporations.

On completion of this module, the participants should be able to: -

- Have a better understanding of the main taxation issues related to businesses and corporations;
- Apply the main taxation principles to real life;
- Have a general appreciation on tax planning opportunities; and
- Have an awareness of international tax developments, particularly in respect of BEPS.

ATP 106: Tax Treaties & Transfer Pricing (18 hours)

To equip participants with an in-depth understanding on the interpretation and mechanism of double taxation agreements (DTA).

Participants should also gain a thorough understanding of the arm's length principle and the essential elements of a comprehensive transfer pricing analysis at the end of the module.

The module will consist of 2 parts – DTA and Transfer Pricing.

The course content for the DTA will include the following:

- The purpose and framework of DTA;
- The interpretation and mechanism of DTA;
- Application of DTA provisions;
- OECD and UN model tax conventions;
- Singapore's key treaty policies;
- Recent developments (Brief overview of MLI and the PPT, EOI, Dispute Resolution and MAP)

The course outline for transfer pricing is as follows:

- The arm's length principle;
- Application of the arm's length principle;
- Transfer pricing documentation;
- MAP/APA;
- Singapore transfer pricing guidelines;
- Latest developments in transfer pricing.

ATP 107: Goods & Services Tax (18 hours)

This unit aims to provide participants with a sound knowledge on the principles of Goods & Services Tax (GST), its practice, specialised areas and industries so that they can be familiar with the GST issues and treatment of business transactions.

Topics include:

- History and development Milestones of GST in Singapore;
- Recap of GST basic principles and schemes;
- Supply and Scope of Tax (including the concepts of taxable person, business, deemed supplies and transfer of going concerns);
- Zero-Rated Supplies (discusses cross-border transactions in goods and international services);
- Exempt supplies (comprising financial services including banks, stockbroking and insurance);
- Input tax recovery rules and partial exemption;
- Special issues in GST (including selected industry developments e.g. e-commerce and telecommunications, REITS).

ATP 108: International Tax Planning (15 hours)

The objective of this module is to acquaint participants with real life, practical aspects of cross border tax planning that multinational companies (MNCs) regularly consider and implement.

In this module, participants will learn how the OECD tax treaty fundamentals are applied in practice and serve as the basis for cross-border transactions engaged in by multinational companies. Participants will also learn of multinational companies' (with particular focus on US and European MNCs) core home country tax rules such as the Controlled Foreign Corporation (CFC) regime that play an important role in the design of tax structures.

Topics include:

- Tax Regime Fundamentals;
- Tax Treaty-Based Planning in Real Life Situations and Treaty Shopping;
- Holding Companies;
- Avoidance of Double Taxation;
- Anti-Avoidance / Controlled Foreign Corporation Rules;
- Losses;
- Merger & Acquisition – Structuring, Financing and Post Merger Integration;
- Tax Efficient Supply Chain Planning;
- Entity Classification, Hybrid Entities and Instruments.

ATP109: International Tax Developments (9 hours)

This module aims to equip participants with practical knowledge of the latest international tax developments and trends. This includes an overview of the Base Erosion and Profit Shifting (BEPS) Action Plan 1.0, how the BEPS Action Plan 1.0 evolved into BEPS 2.0 - Pillars One and Two, and the Pillar Two state of implementation across key jurisdictions.

This module will also cover the impact of Pillar Two on Singapore tax policy (in particular, tax incentives), various real-life examples of Pillar Two considerations, and the increasing focus on tax transparency by stakeholders/tax authorities (e.g., FATCA/CRS/EOI).

ELECTIVE MODULES

ATP 110: Regional (China/India) and US Taxation (9 hours)

This unit provides participants with insights into taxation in the region and US. Participants can expect visiting foreign authoritative figures in taxation to share about the tax systems, trends and developments in regional countries on China, India and US.

ATP 111: Tax Incentives (Financial & Non-Financial Sectors) (9 hours)

This unit enables participants to have an overview of the financial and non-financial incentives. At the end of the module, participants should have an appreciation of the basis of taxation and issues affecting the incentives covered in the module.

The course content on the part on Financial Incentives under the Income Tax Act will include the following:

- Financial Sector Incentive
 - o Standard tier award
 - o Enhanced tier award
- Fund management and fund incentive schemes

The course content on the part on Non-Financial Incentives will include the following:

- Incentives under the Economic Expansion Incentives (Relief from Income Tax) Act:
 - o Pioneer Industries
 - o Pioneer Service Companies
 - o Development & Expansion Incentive
 - o Approved Foreign Loans and Approved Royalties Incentives
- Incentives under the Income Tax Act
 - o Approved Finance and Treasury Centre
 - o Approved Global Trading Company and Qualifying Company

ATP 112: Fraud and Investigation, and Anti-Tax Avoidance Provisions (3.5 hours)

This module is designed for participants who have had a few years experience in tax work but do not have any experience with tax investigation work and anti-tax avoidance provisions. It would be particularly useful to people who are working in Accounting firms servicing clients on their tax assessments requirements.

The objectives of this module are to give participants a brief idea of the law relating to tax fraud and tax investigation, the processes of a tax investigation and the tools used in a tax investigation. The module also provides an overview of the application of anti-tax avoidance provisions in the Income Tax Act and Singapore's tax treaties.

ATP 113: Stamp Duty (6 hours)

This unit enables participants to have a fundamental understanding of the concepts underlying stamp duty. At the end of the unit, they will be able to analyse and appreciate the stamp duty impact in respect of transactions which are not the run-of-the-mill ones.

Topics include:

- Brief history and Concepts of stamp duty
- Tax on Instruments
- Structure of the Stamp Duties Act 1929: Charging Provisions and Heads of Charge in the First Schedule to the Act
- Legal and equitable interests
- Section 15 exemption in respect of (i) Scheme of reconstruction or amalgamation and (ii) transfer of immovable property/stock and shares between associated entities.
- Additional Buyer's Stamp Duty, Additional Conveyance Duty, Seller's Stamp Duty
- General Anti-Avoidance Provisions