

## 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 Saturday mornings on selected weeks, 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
Total Core Units		14
ELECTIVE MODULES#		Units of Credits
ATP 109	Regional (China & India) and US Taxation	1
ATP 110	Tax Incentives (Financial & Non-Financial Sectors)	1
ATP 111 & 112	Fraud and Investigation Stamp Duty	1
Elective Units Required		2

## 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** (8 core and 2 elective modules)  
**S\$6,534.00** (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.

## Subsidies/Grants

Self-funded individuals who are on the full programme of the ATP may apply for SkillsFuture Credit claim and Union Training Assistance Programme (UTAP) funding, subject to the respective conditions. Please visit <https://www.taxacademy.sg/tomorrow-tax-professional/skillsfuture-credit/> for more details.

## Course Schedule

Please visit our website for the updated course schedule.

## Registration

Candidates may complete the [ATP registration form \(full programme\)](#).

## 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 cover the fiscal policy of Singapore, in particular the basic tenets of tax policy and the rationale for the policy stance. Participants will study in detail the structure of the Singapore budget using actual recent budget materials and reports of the Economic Review Committee. Participants will also 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 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 the trade-offs in tax administration in particular, the trade-off between service and 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 unit is to give students an appreciation of the legal processes which mould tax practice.

The topics covered are appeal processes to the Board of Review and the Courts, use of case law authorities and case law analysis, interpretation of tax statutes in arguments and submissions before IRAS and the courts.

The sessions will involve an in-depth analysis of recent Singapore tax cases and the reasoning of the courts in those cases. There will also be an opportunity for the class to examine and discuss interpretation of selected statutes.

#### **ATP 103: Taxation of Individuals (18 hours)**

This unit 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 how such tax liability differs from the perspectives of a resident and a non-resident. The topics covered include employment income; investment income; taxation of self-employed; separate assessment of husbands and wives; reliefs, deductions and rates of tax.

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

This unit enables participants to have an in-depth understanding of certain legal principles which are important to the taxation of companies under the Singapore tax regime.

At the end of the unit, students should be able to understand, analyse and apply legal principles and case law relating to:-

- (i) The determination of whether proceeds from the disposals of assets by a company constitute trading gains or capital gains [Section 10(1)(a) of Income Tax Act];
- (ii) The distinction between other types of capital receipts and income receipts;

- (iii) Residence of a Company;
- (iv) Non-Resident Companies – Distinction between Trading in Singapore and Trading with Singapore;
- (v) The General Deduction Test for determining whether an expense is deductible
  - Section 14(1) and Section 15(1)
  - Distinction between expenditure of a revenue nature and expenditure of a capital nature
  - Test of pre-commencement expenses “In the production of income”
  - Test of “wholly & exclusively”
  - Test of when an expense is “incurred”
  - Application of Section 10E

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

The aim of this unit is to help participants in their practical application of taxation law and principles. It also aims to increase one’s knowledge and understanding of the taxation issues commonly raised by businesses and corporations.

At the end of this unit, the participants should be able to apply the main taxation principles and have a general appreciation on tax planning opportunities. Topics include inbound investment (doing business in Singapore), outbound investment (doing business overseas) and corporate restructuring.

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

This unit equips participants with an in-depth understanding of the interpretation and mechanism of double taxation agreements.

Topics on Double Taxation Agreement (DTA) include:

- Purpose and framework of DTA;
- Interpretation and mechanism of DTA;
- Application of DTA provisions;
- OECD and UN model tax conventions;
- Singapore’s key treaty policies;
- Key provisions in Singapore’s DTA;
- Latest developments in DTAs.

Topics for Transfer Pricing include:

- Arm’s length principle;
- Application of the arm’s length principle;
- Documentation;
- Mutual Agreement Procedure / Advance Pricing Agreements;
- Singapore Transfer Pricing guidelines;
- Latest developments in Transfer Pricing.

At the end of the unit, participants should gain a thorough understanding of the arm’s length principle and the essential elements of a comprehensive transfer pricing analysis.

**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.

**ELECTIVE MODULES****ATP 109: Regional 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 110: 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.

Topics on Non-Financial Incentives include:

- Incentives under the Economic Expansion Incentives (Relief from Income Tax) Act:
  - o Pioneer Industries
  - o Pioneer Service Companies
  - o Development & Expansion Incentive
  - o Overseas Enterprise Incentive
  
- Incentives under the Income Tax Act
  - o Approved Venture Companies
  - o Operational Headquarters Company
  - o Approved Global Trading Company

Topics on Financial Incentives under the Income Tax Act include:

- Financial Sector Incentive
  - o Standard tier award (standard tier, fund management, headquarter services)
  - o Enhanced tier award (bond market, derivatives market, equity market, credit facilities syndication)

### **ATP 111: Fraud and Investigation (3.5 hours)**

The objectives of this unit are to give participants a brief idea of the law relating to tax fraud, tax investigation and tax avoidance.

The unit will cover the law, methods of proving income, the process of an investigation, the role of a tax agent in an investigation, discussions on some prosecuted cases and the application of the law on tax avoidance.

### **ATP 112: 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:

- History and concepts of stamp duty;
- Tax on instruments;
- Structure of the Stamp Duties Act;
- Legal and equitable interests;
- Section 15 exemption; Stamp Duty exemptions for various schemes e.g. REITs, LLPs, etc and General Anti-avoidance Provisions.