

COURSE PROGRAMME

Course Title : **Executive Tax Programme Level II
(International Tax)**

Intake Number : **1/2018**

Level : Intermediate

Recommended for : a) Participants with 1-2 years relevant experience in domestic tax,
and
b) Participants must have basic knowledge of international tax

Course Fees: 5 days (30 CPE Hours)

\$1,230.50

(fee listed include GST, course materials and light refreshments)

Please ensure you have read and understood the [Terms and Conditions](#) for courses.

Overview

This module provides in-depth knowledge in international tax principles and concepts, with focus on specific issues on tax treaty and transfer pricing.

The course will be delivered through a combination of lectures, discussions and case studies to reinforce participants' understanding of tax treaty and transfer pricing principles and concepts.

Outline

1. Transfer Pricing (TP)

- Documentation: Elements of a Transfer Pricing Report. The OECD 3 Tier approach to Documentation: Country-by-Country, Master file and Local file
- Dispute Resolution Part 2: Mutual Agreement Procedures (MAPs) and Advanced Pricing Agreements (APAs)
- Some common areas encountered in practice –
 - Head-office Cost and management fee recharges
 - Financing transactions
- Operational aspects of TP
 - Governance & controls
 - Good implementation of TP through the accounting systems

2. Case study on how to conduct a transfer pricing study

- Toll manufacturer
- Distributor

3. Tax treaty application

- Concept of withholding tax
- Illustrations on the interaction of treaties and domestic tax rules
 - Business profits
 - Interest, dividends & royalties
 - Employment income
 - Foreign tax credit

4. Case studies on interpretation of treaty

5. Recent international tax developments and impact

- Overview of the OECD's BEPS developments
- Highlight of key recommendations and resulting implications
- Unilateral measures
- Permanent establishment
- Prevent treaty abuse – impact of LOB/MPT and implications
- TP documentation – master file and local file (in relation to country-by-country reporting and disclosure of information/greater transparency)
 - Contents
 - Implications

6. Case study on interplay between treaty and transfer pricing
7. Selected countries' tax systems with emphasis on international tax transactions
 - The following countries will be covered:
 - China
 - India
 - Indonesia
 - Key observations, developments and trends
 - Treaty shopping
 - Anti-avoidance rules
 - Case studies

Venue Details

Discovery Training Room, Basement 1, Revenue House, 55 Newton Road

Class Schedule

Date / Day / Time	Module	Lecturer
1 Aug 2018 (Wed) 9.00 a.m. – 4.30 p.m.	Transfer Pricing Case Study – How to Conduct a Transfer Pricing Study	Lee Jingyi Director, Transfer Pricing KPMG Advisory LLP
6 Aug 2018 (Mon) 9.00 a.m. – 4.30 p.m.	Tax Treaty Application	Shantini Ramachandra Partner, International Tax Deloitte & Touche LLP
13 Aug 2018 (Mon) 9.00 a.m. – 4.30 p.m.	Recent International Tax Developments and Impact Case Study	Chester Wee Partner, International Tax Services Ernst & Young Solutions LLP
14 Aug 2018 (Tue) 9.00 a.m. – 12 noon	Selected Countries' Tax Systems • China	Luis Coronado Partner, ASEAN Leader / International Tax Services Ernst & Young Solutions LLP
14 Aug 2018 (Tue) 1.30 p.m. to 4.30 p.m.	Case studies on Interpretation of Treaty	Nico Derksen International Tax Management Pte Ltd
20 Aug 2018 (Mon) 9.00 a.m. to 4.30 p.m.	Selected Countries' Tax Systems • India • Indonesia	Ajay K Sangneria Tax Partner KPMG Advisory LLP Steven Solomon Senior Manager KPMG Services Pte Ltd