

COURSE PROGRAMME

Course Title : Executive Tax Programme Level I (International Tax)

Intake Number : 2 / 2019

Level : Basic

Duration : 3 days (18 CPE Hours)

Course fee: \$695.50
(fee listed include GST, course materials, light refreshment)

Recommended for : Participants with little or no knowledge in international tax.

Participants should preferably have 1 to 2 years of relevant experience in domestic tax.

Class Schedule

Date/Time	Topic	Trainer
4 Nov 2019 9am – 4.30pm	Basic Concepts in Transfer Pricing	Balbir Kaur Group Tax Specialist IRAS
5 Nov 2019 9am – 12noon	Singapore Transfer Pricing Guidelines IRAS Transfer Pricing Consultation (TPC) program	Ng Pei San Group Tax Specialist IRAS
11 Nov 2019 9am – 12noon	Basic Concepts in Tax Treaty Future Developments	Chew Wee Ling Group Tax Specialist IRAS
12 Nov 2019 9am – 4.30pm	Singapore Treaty Network	Jimmy Oei Tax Director Acutus Tax Services Pte Ltd

Venue

Discovery Room, Basement 1, Revenue House, 55 Newton Road, S(307987)

Overview

This module provides basic knowledge in tax treaties and transfer pricing. The module will be delivered through a combination of lectures, discussions and practical cases to reinforce participants' understanding of the basic principles and concepts.

Outline

1. Basic Concepts in Tax Treaty
 - Introduction
 - What is a tax treaty?
 - Objective of a tax treaty
 - Concepts on juridical and economic double taxation
 - Interaction between domestic law and tax treaty, including concepts of tax residence, taxing rights and sharing of taxing rights between jurisdiction
 - Standard Treaty Model
 - How is a treaty structured
 - OECD model and UN model (introduction)
 - Key Articles and Terms
 - Scope of treaty – Persons covered and taxes covered
 - Definitions – resident and permanent establishments
 - Taxation of Income : Business profits, dividends, interest & royalties, capital gains, income from employment, Directors' fees, Artistes and sportsmen, pensions, government service etc
 - Methods of elimination of double taxation
2. Singapore treaty networks
 - Singapore treaty model and positions of selected articles
 - Singapore's comments to the OECD model
 - Singapore's treaty network
 - International tax dispute resolution – MAP, APA
 - Singapore's MAP procedures
 - Common treaty issues
 - Case studies on dispute resolution
3. Basic Concepts in Transfer Pricing (TP)
 - Introduction to Transfer Pricing and TP methods
 - Key concepts
 - Arm's Length Principle
 - Comparative analysis
 - Methods
 - Overview of methods
 - Strength and weakness of each method
 - Practical examples
 - Documentation

- What is documentation and why is there a need for TP documentation
 - Concept of contemporaneous documentation
 - What are the common consequences of lack of TP documentation
 - Disputes and risk management
 - TP audits and risk management
 - TP adjustments
 - Dispute resolution (an introduction)
4. Singapore Transfer Pricing Guidelines
- Background of Singapore TP Guidelines
 - Reference to E-tax guides issued
 - Alignment with OECD TP guidelines
 - Related party lending and routine services 5% safe-harbour
 - Revised Documentation guidance
5. IRAS Transfer Pricing Consultation (TPC) Program
6. Future Developments
- Basic introduction to Base Erosion and Profit Shifting (BEPS)