

## COURSE PROGRAMME

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

Intake Number : **1/2019**

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)

This course is available for skillsfuture credit claim and Union Training Assistance Programme (UTAP) funding. For more information, please visit our website.

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**

<b>Date / Day / Time</b>	<b>Module</b>	<b>Lecturer</b>
<b>27 Sep 2019</b> 9.00 a.m. – 4.30 p.m. Aspiration room	Transfer Pricing  Case Study – How to Conduct a Transfer Pricing Study	Lee Jingyi Director, Transfer Pricing  KPMG Advisory LLP
<b>9 Oct 2019</b> 9.00 a.m. – 4.30 p.m. Aspiration room	Tax Treaty Application	Liew Li Mei Partner, Business Tax  Deloitte & Touche LLP
<b>16 Oct 2019</b> 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
<b>22 Oct 2019</b> 9.00 a.m. – 12 p.m.	Case studies on Interpretation of Treaty	Nico Derksen  International Tax Management Pte Ltd
<b>22 Oct 2019</b> 1.30pm to 4.30pm	Selected Countries' Tax Systems • China	Luis Coronado Partner, Transfer Pricing Leader & International Tax Services  Ernst & Young Solutions LLP
<b>23 Oct 2019</b> 9.00 a.m. to 4.30 p.m.	Selected Countries' Tax Systems • India (morning) • Indonesia (afternoon)	Gaurav Tanna Associate Director KPMG Advisory LLP  Steven Solomon Senior Manager KPMG Services Pte Ltd