

COURSE PROGRAMME

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

Intake Number : 2 / 2018

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 |
|-----------------------------|--|--|
| 1 Nov 2018 9am – 12noon | Singapore Treaty Network | Jimmy Oei Tax Director Acutus Tax Services Pte Ltd |
| 7 Nov 2018 9am – 4.30pm | Basic Concepts in Transfer Pricing | Lou Wai Ling Principal Tax Specialist (Accredited) IRAS |
| 9 Nov 2018 9am to 12pm | Singapore Transfer Pricing Guidelines IRAS Transfer Pricing Consultation (TPC) program | Lou Wai Ling Principal Tax Specialist (Accredited) IRAS |
| 21 Nov 2018 9am – 4.30pm | Basic Concepts in Tax Treaty Recent International Tax Developments | Chew Wee Ling Group Tax Specialist IRAS |

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. Recent International Tax Developments
- Basic introduction to Base Erosion and Profit Shifting (BEPS)