

2019 TEI US Tax Conference

15 to 17 April 2019 | Singapore

Venue:

Revenue House
Discovery Room, B1
55 Newton Road
Singapore 307987

Fees:

Participants may choose to sign up for the full 3-day event or any 2 consecutive days.

TEI members (per day):
SGD280 / USD220

Non-TEI members (per day):
SGD380 / USD300

Above fees exclude 7% GST.
Local participants need to pay above fees plus 7% GST.

Join TEI as a member before the event to enjoy the TEI member's rate !

To register and become a TEI member, please visit TEI website at :

www.tei.org/membership/pages/default.aspx

Closing date for registration:
10 April 2019

To register, please scan the QR Code:



For enquiries on the event, please email:
Jocelyn Chong –
chong_yung_shuen@iras.gov.sg

The **Tax Executives Institute** (TEI) and the **Tax Academy of Singapore** (TAS) are pleased to jointly present the TEI US Tax Conference in Singapore on 15 to 17 April 2019.

This 3-day event will feature leading US tax experts from PricewaterhouseCoopers, Ernst & Young, Baker & McKenzie who will provide participants with an overview of the US taxation system and discuss key features and recent developments.

Discussion topics will include:

Key features and overview of the US tax system

- Types of entities/taxpayers
- Entity classification/Check the box principles, consolidation
- General US tax filing requirements for foreign affiliates, loss utilization
- TP and Section 482
- FATCA, FBAR and related reporting requirement

US outbound

- Controlled foreign corporations
- Subpart F
- 1248 dividends
- E&P
- FTC
- Indirect transfer, credit for underlying income tax
- Section 987 and 988

US Inbound

- Overview and issues relating to Asia

US Tax Reform

- GILTI, FDII, BEAT, Interest Deduction Limitation
- Impact on Asian subsidiaries and reaction of MNEs

Current developments

- US Trade tensions and impact on Singapore
- Digital taxation and EU
- Organizing and automating the tax department of the future

Disputes and Resolution

- US Transfer pricing litigation and lessons therein
- ICAP and other joint audit programs
- CbCR – the view from the US
- US-India APA and MAP experience

Day 1

8.30am-9.00am	Registration
9:00am-9.30am	Opening Address
9.30am-11.00am	Key features and overview of the US tax system <ul style="list-style-type: none">• Types of entities/taxpayers• Entity classification/Check the box principles, consolidation• General US tax filing requirements for foreign affiliates, loss utilization• TP and Section 482• FATCA, FBAR and related reporting requirement
11.00am-11.15am	Coffee Break
11.15am-12.30pm	US outbound <ul style="list-style-type: none">• Controlled foreign corporations• Subpart F• 1248 dividends• E&P• FTC
12.30pm to 2.00pm	Lunch
2.00pm-3.15pm	US Outbound and issues relating to Asia <ul style="list-style-type: none">• Indirect transfer, credit for underlying income tax• Section 987 and 988
3.15pm-3.30pm	Coffee Break
3.30pm-5.30pm	US Inbound <ul style="list-style-type: none">• Overview and issues relating to Asia

9.00am-10.30am	US Tax Reform <ul style="list-style-type: none">• Overview of US tax reform<ul style="list-style-type: none">• key components• Key corporate provisions: GILTI, BEAT, FDII, Interest Deduction Limitation
10.30 am-10.45am	Coffee Break
10.45am-12.00pm	Overview of US tax reform <ul style="list-style-type: none">• Key corporate tax provisions (continued)• Is Sub F gone? Interaction between new and old provisions• Is BEAT inconsistent with the arm's length principle
12:00 pm-2.00pm	Lunch
2.00pm-3.45pm	US Tax reform case studies <ul style="list-style-type: none">• Modeling the impact of GILTI, FDII, BEAT, Interest Deduction Limitation• Discussion of the implications from the perspective of a Singapore hub or subsidiary
3.45pm-4:00pm	Coffee Break
4.00pm-5.30pm	Disputes and Resolution <ul style="list-style-type: none">• US Transfer pricing litigation and lessons learned• ICAP and other joint audit programs• CbCR – the view from the US• US-India APA and MAP experience: lessons for Singapore

9:00am-11:00am	Current Developments <ul style="list-style-type: none">• US Trade Disputes and impact on our region• Digital Economy Taxation and EU State Aid• Organizing and automating the tax department of the future – perspectives from US MNEs (possible panel or industry speaker) to cope with the rise of compliance (FATCA, CRS, CbCR)
11:00am-11:15am	Break
11:15am-12:15pm	<ul style="list-style-type: none">• Inclusive vs Exclusive: US participation in multilateral initiatives (BEPS, Inclusive framework) and US bilateral approach to Treaty, TIEA, MLI, exchange of CbCR, FATCA, CRS and implications for US subsidiaries in Asia
12:15pm-2:30pm	Lunch
2:30pm-4:30pm	Looking into the glass ball – Responses to US Tax Reform & Current Developments <ul style="list-style-type: none">• What's next in the US tax reform and what does that mean for MNCs?• US digital tax proposal and global consensus formation?• Organizing and automating the tax department of the future – perspectives from IRAS as to their future analytics, digitalization plans and US MNEs (possible panel or industry speaker) to cope with the rise of compliance (FATCA, CRS, CbCR) <p>Panel discussion involving mixed panel of IRAS, industry, academic(s) and advisors</p>