

# LexisNexis®

## The Law and Practice of Singapore Income Tax

Third Edition

Editors

Darren Koh • Poh Eng Hin • Tang Siau Yan

Contributing Authors

31 Renowned Tax Professionals

### Key Features

A most comprehensive and concise reference book on taxation of income for tax professionals. This edition aims to explain the fundamental changes to the tax landscape and updates on the Second Edition with a comprehensive coverage and analysis of case law developments, administrative guides and practical application of the income tax law, tax treaties and international tax agreements.

### Benefits

#### Authoritative

A masterpiece contributed by 31 tax experts to share their knowledge, expertise and experience in their areas of specialisation.

#### Relevant

Providing an in-depth discussion on the subject matters, it includes current and relevant analysis of case law developments which is highly critical towards understanding and interpreting the laws.

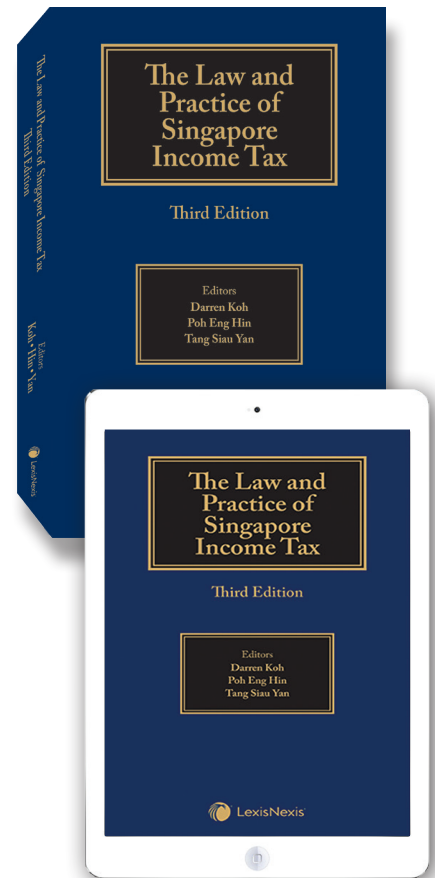
#### Practical

Structured with the tax practitioner in mind, this book features current and pressing issues faced by tax practitioners and is designed to assist readers with addressing the myriad of challenges they have to deal with.

### Foreword

*“This book is timely given the significant changes in the tax landscape over the last few years. Conceived and written by well-respected pioneers of the tax industry, the last two editions were widely held as authoritative in its field by many tax practitioners and a useful reference for the community. I believe this collaborative spirit to share, learn and nurture by all in the tax community augurs well for the continued growth and development of the tax ecosystem in Singapore.”*

**—Ng Wai Choong, Commissioner of Inland Revenue**



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## Editors

### Darren Koh

Vice-Dean of the School of Law and the Head of Programme – Master of Taxation. He graduated top of his Bachelor of Law class at the University of Buckingham, winning the Maxwell Law Prize for his year, and was called to the Bar in England & Wales in 1989. He is also a Chartered Accountant (England and Wales) and a Chartered Tax Adviser (United Kingdom). His tax career started in PricewaterhouseCoopers in London and KPMG in Hong Kong, and then, in industry with Procter & Gamble. He left Procter & Gamble as Associate Director for the ASEAN/Australasia/India region to pursue a career in academia. He obtained his Master of Laws (awarded with Merit) from the University of London, and joined the School of Business of SIM University (now the Singapore University of Social Sciences) as Head of Area – Taxation and Business Law. He is currently a member of the Income Tax Board of Review.

### Poh Eng Hin

Assoc Prof Poh Eng Hin teaches tax-related modules at both undergraduate and post-graduate levels at the Nanyang Business School, Nanyang Technological University. He has a Bachelor in Accountancy from NTU and a Masters in Taxation and Public Finance from the University of Bath. He is also an Accredited Tax Adviser (Income Tax). Eng Hin had been the Examiner for taxation papers of the Chartered Institute of Management Accountants, the Association of Chartered Certified Accountants, and the Singapore Accountancy Commission. He had also served as a member of the Tax Academy of Singapore's Curriculum and Education Development Committee. Currently, he is a member of the board of directors of the Tax Academy and a member of the Income Tax Board of Review.

### Tang Siau Yan

Siau Yan is the Chief Legal Officer of the Inland Revenue Authority of Singapore (IRAS) and heads IRAS' Law Division. IRAS Law Division develops the legal positions taken by IRAS and undertakes all tax litigation matters for IRAS. In his previous appointment, Siau Yan was the Assistant Commissioner of the Tax Policy and International Tax Division of IRAS and a competent authority for Singapore's tax treaties, where his role included the negotiation of tax treaties and the resolution of disputes through mutual agreement procedures..

Siau Yan read law at the London School of Economics and Cambridge University. He began his career with IRAS in 2001. He was a partner in the tax practice of a leading Singapore law firm from 2008 to 2014, before rejoining IRAS in 2014. Siau Yan has authored numerous works, notably the 2011-2013 versions of Lexis-Nexis Annotated Statutes of Singapore: Income Tax Act, Economic Expansion Incentives Act. He had authored the chapters on receipts and tax avoidance in the first two editions of The Law and Practice of Singapore Income Tax.

# Contributing Authors

31 Renowned Tax Professionals

## Darren Koh (Chapter 1 and 2)

Darren Koh is the Vice-Dean of the School of Law and the Head of Programme – Master of Taxation. He graduated top of his Bachelor of Law class at the University of Buckingham, winning the Maxwell Law Prize for his year, and was called to the Bar in England & Wales in 1989. He is also a Chartered Accountant (England and Wales) and a Chartered Tax Adviser (United Kingdom).

His tax career started in Pricewaterhouse Coopers in London and KPMG in Hong Kong, and then, in industry with Procter & Gamble. He left Procter & Gamble as Associate Director for the ASEAN /Australasia/India region to pursue a career in academia. He obtained his Master of Laws (awarded with Merit) from the University of London, and joined the School of Business of SIM University (now the Singapore University of Social Sciences) as Head of Area – Taxation and Business Law. He is currently a member of the Income Tax Board of Review.

## Toh Boon Ngee (Chapter 3)

Boon Ngee is a Tax Partner with KPMG Advisory LLP, Singapore. With more than 30 years of experience in all aspects of corporate tax in a variety of industries, she has a broad array of experiences including providing tax advisory and consulting services on listing of companies, cross-border transactions, group and global restructurings, assets securitizations, mergers and acquisitions, due diligence exercises, obtaining of advance rulings from tax authorities and tax incentives applications.

She has serviced large multi-national corporations and public-listed companies. Her diversified portfolio of clients from the industries included transportation and logistics, power and energy, manufacturing

and trading, infrastructure, construction and engineering, property development and management.

She holds a degree of Bachelor of Accountancy [B.Acc] from National University of Singapore, a law degree [LLB (Hons)] from University of London, and a master degree in Tax Law [MA Tax (Merits)] from King's College London. She is a member of the Institute of Certified Public Accounts of Singapore and an Accredited Tax Advisor with Singapore Institute of Accredited Tax Professionals.

## Wong Siu Ching Cindy (Chapter 4)

Cindy Wong is currently a Tax Director with the Inland Revenue Authority of Singapore. She is involved in policy and technical reviews on income tax issues and has represented Singapore at international meetings at the Organisation for Economic Cooperation and Development (OECD) on income tax matters.

Since joining IRAS in 2001, Cindy has handled tax work on individual and corporate income tax, including for large corporations and advising the Ministry of Finance on the impact of international tax changes on the Singapore tax system. Cindy holds a Bachelor of Accountancy with 1st Class Honours from the Nanyang Technological University and a Masters in Law and Accounting (with Distinction) from the London School of Economics and Political Science. She is an Accredited Tax Practitioner with the Singapore Institute of Accredited Tax Professionals.

## Quek Kay Hian (Chapter 4)

Kay Hian is a senior associate in the Tax Policy Directorate of the Ministry of Finance (on secondment from IRAS), where he handles corporate income tax matters.

Prior to this, he worked in the Corporate Tax Division of IRAS for over 2 years.

Kay Hian graduated with a Bachelor of Laws degree from the National University of Singapore. Before joining IRAS, he practised law for over 3 years in the Tax Practice Group of Allen & Gledhill LLP.

## Tang Siau Yan (Chapter 5)

Siau Yan is the Chief Legal Officer of the Inland Revenue Authority of Singapore (IRAS) and heads IRAS' Law Division. IRAS Law Division develops the legal positions taken by IRAS and undertakes all tax litigation matters for IRAS.

In his previous appointment, Siau Yan was the Assistant Commissioner of the Tax Policy and International Tax Division of IRAS and a competent authority for Singapore's tax treaties, where his role included the negotiation of tax treaties and the resolution of disputes through mutual agreement procedures.. Siau Yan read law at the London School of Economics and Cambridge University. He began his career with IRAS in 2001. He was a partner in the tax practice of a leading Singapore law firm from 2008 to 2014, before rejoining IRAS in 2014.

Siau Yan has authored numerous works, notably the 2011-2013 versions of *Lexis-Nexis Annotated Statutes of Singapore: Income Tax Act, Economic Expansion Incentives Act*. He had authored the chapters on receipts and tax avoidance in the first two editions of *The Law and Practice of Singapore Income Tax*.

## Low Hwee Chua (Chapter 5)

Hwee Chua is currently the Regional Managing Partner for the Tax & Legal practice in Deloitte Singapore and Deloitte Southeast Asia. He has almost 30 years of experience in taxation services including a few years

with the IRAS. Hwee Chua specialises in corporate income tax and international tax, with extensive experience in the areas of tax compliance and consultancy work. He has provided tax advice on a wide variety of tax consulting projects including restructuring, mergers and acquisitions, tax due diligence, and the structuring of inbound and outbound investments. Hwee Chua has also assisted MNCs to apply for tax incentives and grants in Singapore.

Hwee Chua has been consistently recognised by the International Tax Review as one of Singapore's leading practitioners in its Tax Controversy Leaders guide. He is also listed as a leading tax adviser in Singapore by the Expert Guides. Hwee Chua is an Accredited Tax Advisor (Income Tax) with the Singapore Institute of Accredited Tax Professionals (SIATP). He is also a Board member of the SIATP and the Tax Academy of Singapore.

## **Chua Kong Ping** (Chapter 5)

Kong Ping is currently leading the Singapore desk in the International Core of Excellence at Deloitte's New York office. He is also a Director in Deloitte's Singapore office.

Presently based in the US, Kong Ping specialises in providing Singapore tax advice and making regular presentations to US multinationals on tax developments and opportunities in Singapore and the broader Southeast Asian region.

As a director in Deloitte's Singapore office, Kong Ping's experience spans corporate restructuring, supply chain, cross-border payments and permanent establishment issues as well as BEPS and MLI considerations. He also leads a team that is responsible for, amongst others, keeping Deloitte's tax practitioners as well as its clients abreast of developments in Singapore.

Kong Ping regularly writes on topical tax issues for a variety of publications and periodicals such as International Tax Review, International Fiscal Association and the Singapore Business Times.

## **Quek Hui Ling** (Chapter 6)

Hui Ling is Director of the Litigation Branch in the Law Division of the Inland Revenue Authority of Singapore and specialises in tax dispute resolution. Hui Ling was previously a Deputy Public Prosecutor and Deputy Senior State Counsel with the Attorney-

General's Chambers and a Justices' Law Clerk with the Supreme Court of Singapore.

Hui Ling graduated with First Class Honours in law from the National University of Singapore and First Class Honours in accountancy from the Nanyang Technological University. Hui Ling also holds a Master of Laws (International Taxation) degree from the New York University School of Law. She is an Advocate and Solicitor of the Supreme Court of Singapore and a Chartered Accountant of Singapore with the Institute of Singapore Chartered Accountants. Hui Ling is also an Accredited Tax Practitioner (Income Tax) with the Singapore Institute of Accredited Tax Professionals.

## **Deborah Lau** (Chapter 6)

Deborah is a Senior Tax Specialist (Accredited) with the Tax Policy & Ruling Branch in the Inland Revenue Authority of Singapore. She handles matters relating to tax policy formulation, review and implementation as well as legislation drafting to effect policy changes.

Deborah graduated from the Nanyang Business School at the Nanyang Technological University with a degree in Accountancy and had worked at PricewaterhouseCoopers Singapore before joining the Inland Revenue Authority of Singapore in 2003.

## **Sabrina Sia** (Chapter 7)

Sabrina leads the Global Employer Services (GES) division of the Tax Department in Deloitte & Touche Singapore and is responsible for the provision of individual tax compliance and consultancy services for local and expatriate employees in Singapore.

Sabrina has more than 20 years experience in Singapore personal income tax serving multinational and local companies in a variety of industries. She advises clients on mobile employee tax management and a wide range of individual tax and employer tax compliance issues, including on equity and deferred compensation plans and cross-border tax implications for mobile employees. Sabrina also has Singapore corporate tax experience as she started her career managing both individual and corporate tax clients.

Sabrina is a regular speaker at client conferences and seminars held by Deloitte in and outside of Singapore. She also

contributes regularly to media articles and academic publications.

Sabrina has a Bachelor of Accountancy (First Class Honours) at Nanyang Technological University. She is a member of the Singapore Chartered Tax Professionals (SCTP) and Institute of Singapore Chartered Accountants (ISCA).

## **Michele Chao** (Chapter 7)

Michele is a Partner with Deloitte Singapore and has more than 20 years of experience in expatriate tax management. She began her career providing Singapore individual and corporate tax compliance and advisory services. She has worked in China and handled China individual tax issues.

Currently, Michele is responsible for the provision of individual tax advisory and compliance services for expatriate employees from multinational companies. She has extensive experience in coordinating multi-country projects on employment taxes and tax planning for cross-border global mobility situations. She is also the Deloitte Asia Pacific Global Employer Services lead on several key accounts.

Michele has a Bachelor of Accountancy (Hons.) from the Nanyang Technological University of Singapore with a minor in Economics. She is a Certified Accountant with the Institute of Singapore Chartered Accountants (ISCA) and a member of the Singapore Chartered Tax Professionals (SCTP).

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Chester is a partner of EY Singapore. He leads EY's international corporate tax advisory competency in Asean and Singapore.

A recipient of the Commissioner's Book Prize and PricewaterhouseCoopers' Book Prize, Chester completed the inaugural Advanced Tax Programme at the Tax Academy of Singapore. He earned his Bachelor of Accountancy (First-Class Honours) from Nanyang Technological University and was placed on the Dean's List for three consecutive academic years. He is a Chartered Accountant (Singapore) with the Institute of Singapore Chartered Accountants (ISCA) and an Accredited Tax Advisor (Income Tax) with the Singapore Institute of Accredited Tax Professionals.

Chester has more than 20 years of experience in advising multinational

enterprises in the consumer products and retail, technology, real estate, hospitality and construction and shipping sectors on cross-border tax issues, managing tax controversy as well as handling corporate tax compliance and reporting. He has deep knowledge in reviewing holding structures and operating models, managing tax residence issues, identifying and managing withholding tax issues and permanent establishment risks, advising on intellectual property strategies and migration, and tax-efficient repatriation of profits and cross-border financing.

## **Tan Kay Kheng** (Chapter 9)

Tan Kay Kheng heads the Tax Practice at WongPartnership LLP. His practice encompasses both contentious and advisory/transactional work relating to income tax, stamp duty, property tax and goods and services tax, for clients across a number of industry sectors. He regularly appears as counsel in the Court of Appeal, High Court, and the specialist tribunals (Income Tax Board of Review, GST Board of Review, Valuation Review Board and Land Acquisition Appeals Board).

His professional service includes being previously on the boards of the SIATP and the Tax Academy of Singapore, the Accounting Standards Council, and as a divisional councillor of CPA Australia. He also taught as adjunct faculty at the SMU School of Law. He continues to serve on the Inquiry Panel and the Disciplinary Tribunal Panel for the legal profession, and as Vice-Chairman of the Law Society's Compensation Fund Committee. Kay Kheng holds degrees in law, accountancy, taxation and theological studies.

His representative publications includes the SAL Annual Review of Singapore Cases 2005-2019 (revenue law chapter) and the annotated commentary on the Stamp Duties Act (LexisNexis, 2010, 2014, 2015).

## **Jeremiah Soh** (Chapter 9)

Jeremiah graduated from the Singapore Management University with a double degree in law (LLB) and accountancy (BAcc). He is a Senior Associate with the Tax and Trade practice group at Baker McKenzie Wong & Leow and practised tax law at Wong Partnership LLP for 8 years prior to joining Baker McKenzie Wong & Leow. Jeremiah has assisted taxpayers in appeals before all levels of the Singapore courts on complex

and novel issues of tax law in several reported decisions.

He is also experienced in tax advisory and consultancy work, having advised various domestic and multinational companies on a broad range of domestic and cross-border tax issues, particularly in the realm of business restructurings and legal entity rationalisations.

## **Paul Lau** (Chapter 10)

Paul Lau is a partner and the Banking and Capital Markets Tax Leader at PricewaterhouseCoopers Singapore. He also heads the technical and policy team and in that role, represents the firm in discussions with the government and various economic agencies in tax policy developments.

With over 25 years of experience in practising tax, Paul has advised on corporate restructuring, mergers and acquisitions, tax risk management, asset securitisation, capital market instruments, real estate finance, transfer pricing and stamp duty matters. Paul has written widely on the taxation of financial instruments and financial institutions. Among others, he co-authored the capital market transactions chapter in the leading Singapore taxation reference text entitled *The Law and Practice of Singapore Income Taxation* (Singapore: LexisNexis, 2013) and authored the taxation chapter in *Theory and Practice of Islamic Finance* (Singapore: Saw Centre for Financial Studies, 2008).

He chairs the Tax and Levies Committee at Singapore Institute of Accredited Tax Professionals, and represents PwC on the Executive Committee of the International Fiscal Association (Singapore Branch).

## **Harvey Koenig** (Chapter 11)

Harvey is a Tax Partner with KPMG Advisory LLP, Singapore, and leads the R&D Grants and Consulting practice with more than 20 years' experience in both the public and private sector, including as Deputy Director (Tax Policy) in the Ministry of Finance of Singapore. In KPMG, Harvey helped to form Singapore's first dedicated R&D tax incentives practice to assist clients on their R&D tax incentive claims and access to government grants and incentives. He also advises on corporate tax matters, including intellectual property planning, setting up of regional headquarters and cross border mergers and acquisitions.

Harvey contributes to discussions on tax policy matters. He is part of the Singapore International Chamber of Commerce ("SICC") Taskforce on R&D Tax Incentives. Harvey holds a degree of Bachelor of Accountancy (Hons) from Nanyang Technological University, Singapore, and a Master of International Tax from University of Sydney, Australia. He is an Accredited Tax Advisor with Singapore Institute of Accredited Tax Professionals.

## **Tan Tay Lek** (Chapter 12)

He is a Partner with the corporate tax advisory practice of PricewaterhouseCoopers Singapore with more than 20 years of professional experience. He is the International Tax Services leader in the Singapore firm.

He works on a diverse range of clients which includes technology companies, industrial products manufacturers and distributors, educational institutions, consumer products MNCs and treasury companies. He manages PwC's regional direct and indirect tax compliance engagement of a MNC across Asia and Africa, and assists a MNC group automate its periodic tax accounting process for entities in over 40 countries.. He also advises clients on stamp duty issues related to group restructuring, acquisitions and other chargeable transactions.

Tay Lek also has commercial experience from a stint with a US MNC in the technology sector and had previously also worked in PricewaterhouseCoopers New York where he advised global investment funds on their international tax issues.

## **Chung-Sim Siew Moon** (Chapter 13)

Mrs Chung-Sim Siew Moon is a Tax Partner at Ernst & Young Solutions LLP in Singapore. She is the EY Asia-Pacific Tax Policy and Controversy Leader since January 2018. Siew Moon was also the Singapore Head of Tax at EY between July 2013 to June 2018.

With more than 35 years of experience, Siew Moon advises multinationals and local clients from a broad range of sectors and works with various government authorities and regulators on tax matters. She provides tax compliance, controversy and advisory services to her clients and also assists them on the design of tax governance frameworks to manage tax risks.

Siew Moon graduated from the National University of Singapore in 1983 with a

Bachelor of Accountancy (First Class Honors) degree. She is a Fellow Chartered Accountant of the Institute of Singapore Chartered Accountants, a Fellow CPA of CPA Australia and an Accredited Tax Advisor, Income Tax and GST, of the Singapore Institute of Accredited Tax Professionals.

Siew Moon is a frequent speaker at tax seminars. She regularly contributes thought leadership articles to EY and external publications.

## **Leung Yew Kwong** (Chapter 14)

Yew Kwong is Principal Advisor with KPMG. Prior to joining KPMG in 2012, he was a tax lawyer with WongPartnership LLP and has argued a number of notable tax cases before the Boards and the courts. He was with the Inland Revenue Authority of Singapore for 28 years, where he last held the positions of chief Legal Officer and Chief Valuer concurrently. He was awarded the Public Administration Medal (Silver).

Yew Kwong holds professional qualifications in law and real estate valuation and is an Advocate and Solicitor of the Supreme Court of Singapore. He has authored and co-authored books on tax, stamp duties and development charge. He is presently Honorary Tax Advisor to the Real Estate Developers' Association of Singapore and an Accredited Tax Advisor (Income Tax) with the Singapore Institute of Accredited Tax Professionals. He is also on the Panel of Assessors of the Land Acquisition Appeals Board and the Panel of Experts at the Centre of Liveable Cities.

## **Wai Yean Tze** (Chapter 14)

Yean Tze is a Group Tax Specialist with the Corporate Tax Division in IRAS. She has more than 15 years of experience in the areas of income tax policy and tax assessment for individuals and corporations, as well as in international engagement and taxation (exchange of information) matters.

Currently, she oversees the reviews of corporate income tax assessment and tax technical issues relating to the financial sector. Her work also entails supporting the policy review work on income taxation of entities in the financial sector and implementing the relevant income tax policies and tax treatments. She is a Non-Practising Member of the Institute of Certified Public Accountants of Singapore and an Accredited Tax Advisor (Income Tax)

of the Singapore Institute of Accredited Tax Professionals.

## **Edmund Leow** (Chapter 15)

Edmund is a Senior Partner heading up the firm's Tax practice with three decades of experience advising multinational organisations on cross-border tax planning, transfer pricing and tax disputes. He also advises high net worth individuals, private banks and trust companies in personal tax and trust and estate planning matters.

Edmund served as a Judicial Commissioner at the Supreme Court from 2013 to 2016. On stepping down, he was appointed Senior Counsel, making him the first and only Tax and Trust lawyer to be given this accolade nationwide. He has been appointed Deputy Chairman of the Income Tax Board of Review, a statutory tribunal which hears income tax disputes between the Inland Revenue Authority of Singapore and taxpayers.

Edmund is well recognized in the tax practice, having been awarded the Asia Tax Practice Leader of the Year by International Tax Review Asia Tax Awards in 2019. His views on tax and wealth management were widely sought and publicised in the media, such as Bloomberg, BBC, Channel News Asia, Reuters, The Financial Times and The Straits Times.

## **Jow Lee Ying** (Chapter 16)

Lee Ying is a senior lecturer at the Nanyang Technological University and a Director in EY Corporate Advisors Pte. Ltd.'s tax practice based in Singapore. She has extensive experience in a wide spectrum of international tax work, particularly in tax/transfer pricing policy and controversy. This includes transfer pricing audits, Advance Pricing Arrangements (APAs), Mutual Agreement Procedure (MAPs) and tax treaties. Prior to this, Lee Ying was with the Inland Revenue Authority of Singapore (IRAS), Economic Development Board (EDB) and the Ministry of Finance. She is well regarded for her international tax expertise and is a regular speaker at public tax seminars. Lee Ying holds a Bachelor of Science with 1st Class Honours from the National University of Singapore and a Master of International Taxation from the University of Sydney. She is also an Accredited Tax Advisor and an Association of Chartered Certified Accountants graduate.

## **Yong Sing Yuan** (Chapter 17)

Sing Yuan is currently the Tax Director in the Inland Revenue Authority of Singapore dealing with transfer pricing and dispute resolution matters. She has experience in tax policy work and international taxation matters.

Sing Yuan holds a Bachelor of Accountancy with Honours from the Nanyang Technological University and a Master of Advanced Studies in International Tax Law Cum Laude from Leiden University. She is also an Accredited Tax Advisor with the Singapore Institute of Accredited Tax Practitioners. Sing Yuan is the course advisor and ad hoc trainer for programs run by the Tax Academy. She has also contributed to external journals such as the Bulletin for International Taxation by IBFD.

## **Allen Tan** (Chapter 18)

Allen Tan is the head of the Tax, Trade and Wealth Management practice in Baker McKenzie Wong & Leow. He has extensive experience working on both international and local tax issues, with a special focus on the regional tax aspects of the transactions that he is involved in. Allen's clients include Global Fortune 500 multinational corporations and major Singapore conglomerates. He is recognised as a leading lawyer for his tax controversy and corporate tax work in many leading legal and tax directories including International Tax Review, Chambers Asia Pacific and Legal 500 Asia Pacific. Allen was also named the Asia Tax Practice Leader of the Year 2018 by International Tax Review.

Allen focuses on tax issues arising from corporate and supply chain reorganisations, foreign direct investments, cross-border planning/restructuring, transfer pricing, mergers and acquisitions, private equity fund structuring, tax controversies (both domestic and cross-border), as well as indirect and transfer taxes. In recent years, Allen has also been actively engaged in tax policy work, both in Singapore and internationally.

## **Nicholas Neo** (Chapter 18)

Nicholas leads the tax policy work for APAC at Facebook.

Prior to Facebook, Nicholas was Director for Exchange of Information (EOI) at IRAS where he formulated Singapore's tax transparency

policies and implemented global EOI standards including CRS and FATCA in Singapore. As Singapore's Competent Authority, Nicholas represented Singapore at various bilateral and multilateral forums including the OECD where he collaborated with other jurisdictions on international EOI standard setting and compliance by financial institutions. Nicholas also had experiences in managing transfer pricing disputes and advance pricing arrangements, negotiating tax treaties, formulating Singapore's tax policies, and ensuring compliance by large taxpayers.

Nicholas holds a Sloan Masters of Leadership and Strategy degree (with distinction) from London Business School. He graduated *summa cum laude* from the Singapore Management University with double bachelor's degrees in Accountancy and Business Management. Nicholas is a Chartered Accountant of Singapore and an Accredited Tax Advisor (Income Tax).

### **Robin Ng** (Chapter 18)

Robin is a Director in the Inland Revenue Authority of Singapore. Robin oversees matters relating to DTAs, policies relating to exchange of information on request, tax transparency, international tax cooperation and administrative assistance as well as international tax relations. Robin graduated from the Nanyang Technological University of Singapore with a bachelor's degree in Accountancy and the Vienna University of Economics and Business with a Master of Laws degree in International Tax Laws. Robin is also a Chartered Accountant (Singapore) and an Accredited Tax Advisor (Income Tax).

### **Jasmine Chin-Sabado** (Chapter 19)

Jasmine was the first Director of Prosecution & Compliance at the IRAS. She also served as a Deputy Public Prosecutor at the Attorney-General's Chambers where she prosecuted capital offences. Prior to joining the public service, Jasmine practiced at Rajah & Tann Singapore LLP and Allen & Gledhill LLP, specializing in shipping and admiralty litigation.

Jasmine is currently the Deputy Director at the Policy Advisory Division of the Ministry of Law where she shares legal expertise and advice to shape policy, drives law reform and executes policy initiatives.

### **Fang Fang** (Chapter 19)

Fang Fang has almost 40 years of experience in tax as tax practitioner in international accounting firm and in-house advisor. Following her retirement as Vice President, Group Tax at Singapore Telecommunications Limited (Singtel), she continues to advise senior management of Singtel on tax disputes and controversies matters.

Fang is currently a member of the Tax & Levies Committee of the Singapore Chartered Tax Professionals (SCTP). She previously served as a member of the Board of Directors of the Singapore Institute of Accredited Tax Professionals, the Taxpayer Feedback Panel of IRAS and the Tax Policy Interest Group of the Singapore International Chamber of Commerce.

She is the author of Chapter 24 on Telecommunications in *The Law and Practice of Singapore Income Tax*, second edition. Fang holds a Master of Taxation from the University of New South Wales and a Bachelor of Accountancy from the University of Singapore. She is an Accredited Tax Advisor (Income Tax & GST) of SCTP and a Fellow of the Institute of Singapore Chartered Accountants and the CPA Australia.

### **Tay Ang Sim** (Chapter 19)

Ang Sim is currently a Group Tax Specialist in IRAS. He has over 20 years of experience in tax administration and tax policy work in Corporate Tax and Goods & Services Tax (GST).

Ang Sim is an IRAS accredited tax specialist in Corporate Tax and GST. Ang Sim graduated from Singapore Nanyang Technological University with a Bachelor's degree in Accountancy (Hons).

### **Ong Ken Loon** (Chapter 20)

Ken Loon is Head of Tax and Private Client Services at Drew & Napier LLC. She advises on tax aspects of corporate transactions, including income tax, GST, stamp duty, and property tax. She also assists clients with negotiations with the IRAS and represents clients before the tax tribunals and Singapore courts.

Her clients come from across business sectors. She advises local and multinational

corporate groups, financial institutions, and investment funds on a broad range of transactions, including mergers and acquisitions, corporate structures and restructurings. In addition, Ken Loon works with private clients to provide solutions to complex tax, succession and private wealth management issues.

Before joining Drew & Napier in 2008, she was a Principal Legal Officer in the Law Division of the Inland Revenue Authority of Singapore.

She is recognised as one of Singapore's leading tax lawyers by Chambers & Partners, The Asia Pacific Legal 500 and International Tax Review's World Tax.

### **Charles Li** (Chapter 20)

Charles is a dual-qualified lawyer and accountant. He has broad experience in both the private and public sectors, having worked in a law firm, an accounting firm and the tax authority. He was formerly a senior legal specialist and tax prosecutor with the IRAS dealing with tax appeals and prosecutions. He teaches at a local university and conducts seminars from time to time.

Charles is familiar with the different types of taxes and duties, and has experience with exchange of information, international tax and transfer pricing issues. He represents clients before the tax tribunals and the courts, and also assists clients with their applications for advance rulings, adjudications, reliefs, remissions and tax incentives.



# LexisNexis®

## The Law and Practice of Singapore Income Tax

Third Edition

Editors

Darren Koh • Poh Eng Hin • Tang Siau Yan

Contributing Authors

31 Renowned Tax Professionals

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Title	ISBN	Unit Price (SGD-nett)	Unit	Total (SGD-nett)
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