

Attribution of Business Profits and the Taxation of Permanent Establishments

20 July 2007 • 9.00am to 5.00pm • Sheraton Towers • Singapore

SEMINAR OUTLINE

As businesses grow and expand across borders it is invariable that they will establish presence in various countries with which they trade. The presence of such establishments can have tax consequences. It is therefore important that businesses understand and appreciate their exposures to maximize returns from their overseas venture, for example China. Tax experts from OECD, on China and Singapore will lead this one-day seminar. There will also be breakout sessions to facilitate discussions and deliberations.

PROGRAMME

Perspectives on Permanent Establishments and Profit Attribution

Mr David Partington - Principal Administrator, Tax Treaties Unit, OECD

Doing business in China - Your Tax Exposure

Mr Ho Khoonming - Head of Tax, KPMG in Beijing, China

Workshop by OECD Experts : Mr David Partington and Mrs Ariane Pickering - Principal Adviser Treaties in the International Tax and Treaties Division Australian Department of the Treasury

Or

Workshop by Mr Ho Khoonming

Networking Buffet Lunch

An Analysis of Permanent Establishments and the Taxation of Trading and Business Profits in Singapore

Mr Leung Yew Kwong - Partner, WONGPARTNERSHIP

Analysis of Permanent Establishments from the Viewpoint of Treaties

Mr Tan How Teck - Associate Professor, Nanyang Business School Nanyang Technological University

Case Studies on Permanent Establishments & Panel Discussion

Ms Tan Cheng Cheng - Deputy Director (International Tax) Inland Revenue Authority of Singapore

Other Panelists

Mr Leung Yew Kwong, Mr Tan How Teck and Mr Sum Yee Loong - Partner, Deloitte & Touche

WHO SHOULD ATTEND

Chief Executive Officers, Regional Tax Directors, Chief Financial Officers, Financial Controllers, Accountants, Legal Professionals and Tax Professionals

ADMINISTRATIVE DETAILS

Early Bird Price (before 20 June)
- \$367.50 (Incl. 5% GST)

Usual Price
- \$420 (Incl. 5% GST)

Payment on/after 1 July
- \$428 (Incl. 7% GST)

Limited Seats. First-come-first served basis

Closing date for registration : **29 June 07**

Confirmation of registration is strictly upon receipt of cheque payment and registration form. Please refer to details in the registration form for registration procedures.

(The seminar qualifies for 7 CPE hours)

For enquiries, please contact:

Ms Jocelyn Chong (DID: 6351-3040) • Ms Faridah Omar (DID: 6351-3039)

About the Speakers, Workshop Leaders and Panel Members



Mr David Partington
Principal Administrator
Tax Treaties Unit
OECD

David Partington works with the OECD's Tax Treaties Unit at the OECD headquarters in Paris. His work is divided between tax treaty policy matters (including the on-going process of updating the OECD Model Tax Convention) and conducting technical seminars on international taxation for tax administrators and policy officials in emerging economies. As head of OECD's work with non-OECD economies on treaty matters, David has conducted over 80 seminars throughout the world on a variety of tax treaty issues including the application of treaties, detailed consideration of specific treaty provisions, treaty policy, international tax avoidance and treaty negotiations. David also has a key role in the development and organisation of the OECD's annual Global Forum meeting on international tax, which brings delegates from close to 100 countries together for intensive discussions on current international tax issues.

Prior to his move to Paris in 1999, David worked for the New Zealand Government as head of International Tax Policy. In that role he was heavily involved, for nine years, with the comprehensive reform of New Zealand's international tax regimes and the negotiation of its tax treaties.



Mrs Ariane Pickering
Principal Adviser
Treaties in the International Tax and Treaties Division of the Australian Department of the Treasury

Ariane Pickering is the Principal Adviser – Treaties in the International Tax and Treaties Division of the Australian Department of the Treasury. As chief tax treaty negotiator for Australia, she has responsibility for developing tax treaty policy and negotiating and implementing Australia's tax treaties. With more than 20 years experience in the Australian Taxation Office prior to moving to Treasury in 2002, she has a long history of involvement in the drafting, application and interpretation of Australian tax treaties as well as in policy development and interpretation of the OECD Model Tax Convention. She has for many years been Australia's main delegate to the OECD's Working Party 1 on Tax Conventions and has participated in many of the sub-groups of Working Party 1 on specific issues including the work on electronic commerce, permanent establishments, non-discrimination and profit attribution. She also chairs a Working Group of Working Party 1 that is currently examining the taxation of income from services under tax treaties.



Mr Ho Khoonming
Head of Tax
KPMG in Beijing, China

Ho Khoonming is a tax partner, and head of tax at KPMG in Beijing, China. Khoonming has been actively involved in advising foreign investors in respect of their investments and operations in China since 1993. He has experience in advising issues on investment and funding structures, repatriation and exit strategies, mergers, acquisitions and restructuring.

Khoonming has worked in different parts of China, including Beijing, Shanghai and southern China and has also advised the Budgetary Affairs Committee under the National People's Congress of China on post-WTO tax reform. He is a frequent speaker at tax seminars and workshops for clients and the public, and an active contributor to thought leadership in tax issues. Khoonming is a member of the Institute of Chartered Accountants in England and Wales (ACA).



Mr Sum Yee Loong

Partner
Deloitte & Touche

Sum Yee Loong has extensive experience in the taxation of multinationals and local companies which includes financial institutions, international trading companies, manufacturing companies and information technology companies. His areas of expertise include devising strategies and leading tax review teams to create and identify tax saving opportunities; structuring and restructuring for IPOs; international and regional tax planning and advising and negotiating tax incentives for corporate clients.

He is currently an Associate Professor (Adjunct) with the Singapore Management University. He is a member of the Taxation & Levies Committee of ICPAS, and was a member of the Tax Advisory Committee and the Infocom Technology Committee. He has authored the Singapore Tax Workbook published by CCH and is also an examiner for the Advance Taxation Paper for ACCA. He is a fellow of the ACCA(U.K.), a Chartered Tax Advisor (UK) and a CPA of Singapore.



Mr Leung Yew Kwong

Partner
WONGPARTNERSHIP

Leung Yew Kwong is a tax partner in WongPartnership and was previously with the Inland Revenue Authority of Singapore. He has authored several books on income tax, goods and services tax, stamp duty, property tax and development charge.

He is presently Honorary Tax Advisor to the Real Estate Developers' Association of Singapore, Honorary Legal Adviser to the Institute of Estate Agents and a Member of the Tax Advisory Committee of the Ministry of Finance. He is an Adjunct Associate Professor in the School of Real Estate at the National University of Singapore.



Ms Tan Cheng Cheng

Deputy Director
International Tax
Inland Revenue Authority of Singapore

Ms Tan Cheng Cheng is the Deputy Director of the International Tax Branch at the Inland Revenue Authority of Singapore.

As the competent authority of Singapore, she is actively engaged in the formulation of tax treaty policy, as well as the negotiation and implementation of Double Taxation Agreements. She also handles Mutual Agreement Procedure and Advance Pricing Arrangement discussions pertaining to transfer pricing issues. Cheng Cheng has several years of experience in assessing and tax policy work in IRAS. She also spent a year on secondment with the Ministry of Finance. Prior to her current appointment, she was with the international tax practice of PricewaterhouseCoopers in New York for two years.



Mr Tan How Teck

Associate Professor
Nanyang Business School
Nanyang Technological University

Tan How Teck served with the then Inland Revenue Department from 1987 to 1993. Other than having assessed the income taxation of individuals and companies, How Teck also has the experience of preparatory work for tax treaty negotiations and proposed tax changes. He was a tax manager in Deloitte and Touche before joining Nanyang Technological University in 1996.

How Teck currently teaches taxation at NTU. He has published in international refereed journals, and was a co-author of Singapore Master Tax Guide (1999 to 2006 editions). His works have been translated into Chinese and cited in local and foreign publications. He is a member of ICPAS and ACCA (U.K.).

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REGISTRATION

Salutation:	Dr / Mr / Ms / Mrs / Miss			
Full Name (Please <u>underline</u> family name)				
Organisation:				
Position/Job Title:				
Office Address:				
Mailing Address: (If different from Office Address above)				
Email Address:				
Telephone No.(Mobile / Home) :				
Fax Number :				
<p>Please select one workshop only (Please tick)</p> <table style="width: 100%; border: none;"> <tr> <td style="text-align: center; width: 45%;"> Workshop A by OECD Mr David Partington and Mrs Ariane Pickering <input type="checkbox"/> </td> <td style="text-align: center; width: 10%;">OR</td> <td style="text-align: center; width: 45%;"> Workshop B by Mr Ho Khoonming, Head of Tax, KPMG in Beijing, China <input type="checkbox"/> </td> </tr> </table>		Workshop A by OECD Mr David Partington and Mrs Ariane Pickering <input type="checkbox"/>	OR	Workshop B by Mr Ho Khoonming, Head of Tax, KPMG in Beijing, China <input type="checkbox"/>
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Terms & Conditions

- If you require an invoice to make payment, please notify the organizer (enquiry@taxacademy.com.sg) by 9 June 2007.
- Confirmation of registration is strictly upon receipt of cheque payment and registration form.
- Cheques should be crossed and made payable to "Tax Academy of Singapore" indicating the seminar title at the back of the cheque. Please send the registration form with your cheque to the following address:
Attn: Ms Faridah Omar - Tax Academy of Singapore, #06-03, 55 Newton Road, Revenue House, Singapore (307987)
- Confirmation will be sent via email. Please bring the Confirmation email for admission purposes.
- There will be no refund for any seminar withdrawal after the Confirmation email has been sent.
- Tax Academy of Singapore reserves the right to cancel the event, or make changes to the schedule, venue and speakers.

Mailing List

- Please tick here if you do not wish to be on our mailing list for future workshops & seminars.

For enquiries, please contact:

Ms Jocelyn Chong (DID: 6351-3040) or Ms Faridah Omar (DID: 6351-3039)