

This 3-day seminar on Tax Treaties, European Tax Law and Transfer Pricing is jointly presented by the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business), and the Tax Academy of Singapore.

The seminar is specially designed to enhance participants' competence in tax treaty law (with specific focus on recent court decisions in various countries), provide participants with an appreciation of European direct tax law, and advanced level instruction on tax planning and transfer pricing issues in multinational companies. Case studies and practical examples are also incorporated to stimulate discussion and interaction among participants. The seminar will be led by an expert team from the Institute for Austrian and International Tax Law:

- Professor Dr. Dr.h.c. Michael Lang
- Professor Dr. Pasquale Pistone
- Professor Dr. Alfred Storck

The seminar is designed for :

- Tax professionals advising on cross-border investments and transactions, tax officials involved in tax treaty related work in government.
- Singapore-based companies attempting to invest into Europe, and vice versa.
- Multinational Companies seeking to gain insights into effective tax planning strategies.

About the speakers

Professor Dr. Dr.h.c. Michael Lang

Professor Lang is Head of the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business) in Vienna, Director of the LLM Program in International Tax Law and of the Doctoral Program in Business Taxation at WU, and Chairman of Academic Committee (AC) of the European Association of Tax Law Professors (EATLP).

Professor Dr. Pasquale Pistone

Professor Pistone is a Jean-Monnet ad personam Professor of European Tax Law and Policy at WU (Vienna University of Economics and Business). He is also an Associate Professor of Tax Law at the University of Salerno (Italy), and Member of the Junior Chamber of the Austrian Academy of Sciences and of the Board of Editors of Intertax.

Professor Dr. Alfred Storck

Professor Storck is a visiting professor at the Institute for Austrian and International Tax Law, Vienna; Honorary professor for Company Financing and Business Taxation at the university of St. Gallen, Switzerland; and former Tax and Finance Executive in a multinational Company.

About the Institute for Austrian and International Tax Law

The Institute for Austrian and International Tax Law is among the largest academic institutions in the world doing research on and teaching about tax law. It is part of the WU (Vienna University of Economics and Business).

Its main fields of interest are corporate tax law, international tax law and European tax law. Most of its research and teaching activities deal with issues in these areas. Its research activities ensure the quality of its teaching, and that, vice versa, teaching helps to develop, structure and discuss research ideas.

About Tax Academy of Singapore

The mission of the Tax Academy is to raise the professional competency of the tax community and develop Singapore into a regional tax knowledge hub. A not-for-profit institution, the Tax Academy was set up by the Inland Revenue Authority of Singapore in collaboration with the international accounting firms – Deloitte & Touche, Ernst & Young, KPMG and PricewaterhouseCoopers, the Institute of Certified Public Accountants of Singapore and the Law Society of Singapore.

The Academy collaborates with leaders in the industry and the academia to develop and deliver programmes that effectively raise the professional competency, knowledge and capabilities of the tax community. It provides the platform for exchange among tax officials, tax professionals and the academia. The Academy also supports the strategic engagement of foreign tax officials and policymakers through its regional programmes.

Seminar Details

Administrative details

Dates: 8 to 10 November 2011

Time: 9.00am to 5.30pm

Venue: Top of the York, Level 21, York Hotel, 21 Mount Elizabeth, Singapore 228516

Daily teabreaks and lunch will be provided at the hotel.

Fees: SGD 700 per day / SGD 2,000 for 3 days (Fees exclude 7% GST. Local participants need to pay above fees plus 7% GST. Please refer to Registration Form for details.)

Participants may choose to sign up for the full 3-day event or a combination of any of the 3 days.

Closing date for registration: 17 October 2011

Confirmation of registration is strictly upon receipt of payment. Please fax or email the completed registration form to:

Fax - 6253 1214

Email – seminars@taxacademy.sg

Seminar Programme

Day 1 – 8 November 2011

By Professor Dr. Dr.h.c. Michael Lang

Morning session

The Interaction of Tax Treaty Law and Domestic Law

- Treaty Interpretation
- Art 3 par 2 OECD Model Convention
- OECD and UN Model Conventions

Treaty Entitlement

- Residence
- Treaty Shopping
- Dual Residence

Afternoon session

Source Taxation and Treaty Law

- Withholding Taxes and Beneficial Ownership
- Permanent Establishments
- Peculiarities of Bilateral tax Treaties

Residence Taxation and Other Aspects of Treaty Law

- Methods to Avoid Double Taxation
- Mutual Agreements and Arbitration
- Qualification Conflicts

Day 2 – 9 November 2011

By Professor Dr. Pasquale Pistone

Morning session

The Sources of EU Law

- The nature of EU Law System and of its Institutions
- The sources of EU Law: EU Primary and Secondary Law, EU International Agreements, Soft Law
- The pattern of European tax integration and the policy efforts

Fundamental freedoms in the internal market and in relations with third countries

- Structure and scope of the 4 fundamental freedoms
- The 4 steps in applying the 4 fundamental freedoms to direct taxes
- The pattern of fundamental freedoms in relations with third countries

Afternoon session

Fundamental freedoms: a cluster analysis

- Abuse (EU internal market) and effectiveness of fiscal supervision (third countries only and including an overview of the EU old and new directives on mutual assistance)
- Primary (exit and trailing taxes) and secondary right of establishment (group and PE taxation)
- Corporate-shareholder integration

State aids and selected issues of Secondary Law (from a third country perspective)

- Harmful tax competition, good tax governance and the prohibition of State aids
- The Parent-subsidiary directive and the Interest-Royalty directive (internal market and in relations with Switzerland)
- The Savings directive and EU international agreements and how EU standards for tax exchanging information affect international taxation in relation with third countries in absence and presence of tax treaties

The impact of European Union law on international tax planning with the European Union and the relations with Singapore.

Special considerations for :

- The reaction of EU law to non-EU preferential and low-tax regimes and tax planning involving them

Day 3 – 10 November 2011

By Professor Dr. Alfred Storck

Morning session

Tax Planning as Part of Corporate Planning / Tax Policies/Corporate Governance

- MNCs' and global business models
- Tax Planning strategies – “sustainable” versus “aggressive” Planning /Corporate Governance issues
- Sustainable Tax planning and related company processes
- Tax Planning and Legal Structures (“Group Corporate Structure”)
- Holding Regimes and Taxes (comparison)
- Country - versus Divisional holdings
- Regional Holdings and its potential benefits
- Transfer Pricing – Methods and Business Restructurings
- OECD Transfer Pricing Guidance and Transfer Pricing Methods
- Business Restructurings
- APA/MAP and Arbitration
- Transfer Pricing documentation

Management- and Administrative Services

- Intra-group Service charges under OECD /German and US rules
- Group-internal charges in a global company (case studies)

Afternoon session

Group Financing and Tax Planning

- Financial Strategies/Policies in global companies
- Finance companies and Capital markets
- Intra – group Capital structures and Financings and Thin-Capitalisation Rules/ Pricing of interest
- Treasury Centers and Cash pools
- Case studies

License - and Cost sharing arrangements for Research and Development

Research and Development activities in MNC

- Cost-sharing arrangements (cost-contribution arrangements)
- Specific US Tax aspects on CSA (Veritas Case)
- License models for Technologies
- Pricings for Contract R+D and for royalties Trademarks/Tradenames and Taxes
- Licensing of Trademarks
- Case studies

Registration

Title	Dr / Mr / Ms / Mrs / Miss
Full Name (Please <u>underline</u> family name)	
Organisation	
Position/Title	
Telephone number	
Email Address	
Contact details of co-ordinator (For invoicing purpose)	Name :
	Postal address :
	Email :
	Telephone number :
	Fax number :
Seminar selections (please tick)	
Full seminar, 3 days	<input type="checkbox"/>
Or any single day, or any combination of 2 of the 3 days:	
a) Day 1 of the seminar	<input type="checkbox"/>
b) Day 2 of the seminar	<input type="checkbox"/>
c) Day 3 of the seminar	<input type="checkbox"/>

Payment options

I enclose a cheque of SGD _____ made payable to Tax Academy of Singapore.

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, #B1-01, 55 Newton Road, Revenue House, Singapore (307987)

Telegraphic Transfers

Information concerning telegraphic transfers :

- a) Bank number: 7375 / Branch number: 016 / Account number: 339-301-770-6
Swift Code: UOVBSGSG
- b) Applicant will bear all local and overseas bank charges for telegraphic transfers
- c) A copy of the remittance advice to be faxed to (65) 6253 1214 or emailed to jocelyn@taxacademy.sg

Please send me a receipt.

Other information

- Local participants shall pay registration fees plus 7% GST. Local participants refer to individuals based in Singapore.
- Foreign participants, who in their business capacity belong overseas and sponsored by overseas employers, are excluded from paying 7% GST.
- Confirmation of registration is strictly upon receipt of payment and registration form.
- Confirmation will be sent via email. Please bring the confirmation email for admission purposes.
- There will be no refund for any withdrawal after the confirmation email has been sent. Replacement delegates may be sent.
- The Institute for Austrian and International Tax Law and Tax Academy of Singapore reserve the right to cancel the event, or make changes to the schedule, venue and speakers.